MINOR AMENDMENT CONSULTATION – PARTICIPANT RESPONSE PACK

MSATS PROCEDURES:

Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations Version 4.7

Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs Version 4.7

Participant: AGL

Submission Date: 4 Jan 2019

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1. Proposed Changes

This section lists the changes proposed by participants or by AEMO since the last completed consultation *MSATS Procedures:*

- *Section 4.1 covers the proposed changes to the CATS Procedure Version 4.6*
- *Section 4.2 covers the proposed changes to the WIGS Procedure Version 4.6*

NOTE: All proposed additions to the MSATS Procedures are highlighted in red colour text and are underlined. All proposed deletions from the MSATS Procedures are highlighted in red strike through text. Example: ~~Reference.~~

Comments on Procedure Consultation Process

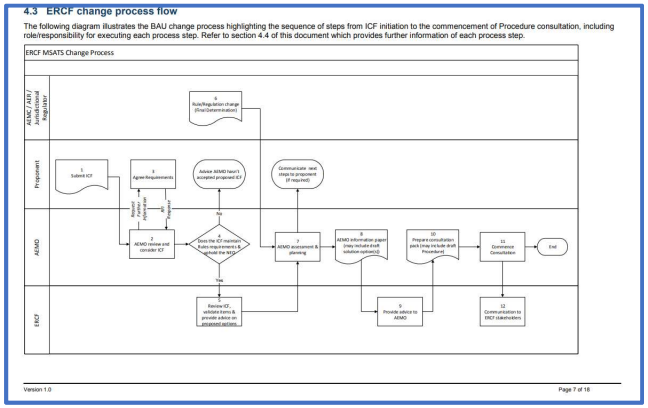
While AGL considers the subject matter of this particular consultation minor, AGL has concerns over the means by which this consultation was undertaken in terms of pre consultation discussion with participants and the public Notice to Participants - particularly in light of the time of year and the number of other consultations underway during December 2018.

Historically and, in most ways, current practice would be for AEMO to circulate the proposal to the relevant industry working group interested parties and seek informal feedback from the specific working group – in this case the ERCF.

AEMO established the ERCF with the following purpose:

> **1. Purpose**
>
> The purpose of the Electricity Retail Consultative Forum (ERCF) is to provide a platform where Participants operating in the National Electricity Market (NEM), AEMO and interested parties can collaboratively participate in the enhancement of Market Settlement and Transfer Solution (MSATS) Procedures.
>
> ERCF Terms of Reference
> (https://www.aemo.com.au/Stakeholder-Consultation/Industry-forums-and-working-groups/Retail-meetings/Electricity-Retail-Consultative-Forum)

AEMO also established a change process for the ERCF to operate under, which includes consultation with the ERCF prior to a public consultation. This process specifically calls out the pre-consultation use of the ERCF to discuss a proposal as shown below.



AGL, (as far as it is aware) is still a member of the ERCF and was not advised of this proposal nor was it able to consider this proposal or suggest any other minor amendments which could have also been included in this minor consultation.

AGL is also concerned that AEMO's obligations under the NER (ch 7.16.1 requires a consultation of this nature to be conducted under Ch 8 – Part F –Rules consultation procedures.

Cl 8.9(b) of the NER requires

> (b) The *consulting party* must give a notice to all persons nominated (including *Intending Participants* in the class of persons nominated) by the relevant provision as those with whom consultation is required or, if no persons are specifically nominated, *AEMO*, all *Registered Participants* and interested parties, (**Consulted Persons**) giving particulars of the matter under consultation, by publishing the notice in accordance with rule 8.9(c).

The requirement to notify all specifically nominated persons (not registered participants) reasonably means that AEMO should have provided specific advice via various distribution lists to industry working group members, such as the nominated ERCF members and interested parties.

The Notice that was issued by AEMO for this consultation was embedded as an internal component of a general AEMO Communication sent to an AEMO Communications Distribution list.

This is of concern for AGL as specific staff have dropped off various AEMO distribution lists or not been added in a timely manner on more than one occasion in recent months. The result of this has been that the relevant staff at AGL has not been apprised of relevant information or a consultation until well after the process has commenced. AGL has no reason to believe that this issue is limited to just AGL and therefore could impact multiple participants.

The outcome of such issues leaves AGL with less time to consider the implications of any proposed actions going forward and means that AGL, like other participants is reliant on informal communications to monitor market changes.

AGL and other businesses rely heavily on the targeted emails issued in relation to consultations to ensure they can participate appropriately.

AGL has always strongly supported a collaborative and transparent approach to industry change and has frequently argued for and supported greater inclusion and transparency in matters of market change.

We strongly believe effective industry engagement is impetrative in gaining a comprehensive understanding of the potential impacts of decisions and minimising this is detrimental to good efficient industry outcomes which ultimately impact consumers.

a. Proposed Changes to the CATS Procedure

Item	ICF or Change ID	Description	Participant Comments
1		**PROPOSED / REQUESTED CHANGES**	
1.5	ICF_002	The following proposed solution refers to the listed scope item ICF_002 - Post PoC Updates to MSATS Procedures – Objections raised by Tango Energy identified above: Section 36. CR6700/6701 - CHANGE MPB OR MPC OR BOTH – SMALL OR LARGE **36.7 Objection Rules** The 'Yes' Roles specified in Table 36-B may Object using the Objection Codes indicated against their Roles within the Objection Logging Period specified in Table 36-A. **Table 36-A~~B~~ – Objection Rules**** CR 6700 – Change MP CR 6701 – Change MP – Retrospective	AGL support the proposed changes to the MSATS Procedures. These, like a number of other changes were not dealt with during the Power of Choice Consultations. AGL agree with AEMO's assessment of the matters for consultation, we do not foresee this to have negative impacts to market participants. We agree that this change further supports the objective of the initial change supported by the Electricity Retail Market Consultative Forum (ERCF) that was overlooked in the initial consultation.

Objection Code	NMI Class	Jur'n	FRMP		LR		MDP		MPB		RoLR		RP		LNSP	
			N	C	N	C	N	C	N	C	N	C	N	C	N	C
DECLINED	ALL	ALL	-	-	-	-	-	-	Yes	-	-	-	-	-	-	-
NOTAPRD	ALL	ALL	-	-	-	-	-	-	-	-	-	-	-	-	-	Yes
DATEBAD	ALL	ALL	-	-	-	-	Yes	Yes	-	-	-	-	-	-	-	-

** N = New Role, C = Current Role.

36.8 Change Request Status Notification Rules

The Change Request Status Notification Rules are specified in Table 36-C.

Item	ICF or Change ID	Description	Participant Comments
		Table 36-BC – Change Request Status Notification Rules CR 6700 – Change MP CR 6701 – Change MP – Retrospective PARTICIPANT ROLE – Receives Notification of Change	

Status Change	FRMP		LR		LNSP		MDP		MPB		RoLR		RP	
	N	C	N	C	N	C	N	C	N	C	N	C	N	C
CANCELLED	-	-	-	-	-	Yes	-	-	Yes	Yes	-	-	-	Yes
COMPLETED	-	Yes	-	-	-	Yes	-	Yes	Yes	Yes	-	-	-	Yes
OBJECTED	-	-	-	-	-	Yes	-	-	Yes	Yes	-	-	-	Yes
PENDING	-	-	-	-	-	-	-	-	Yes	Yes	-	-	-	Yes
REJECTED	-	-	-	-	-	Yes	-	-	Yes	Yes	-	-	-	Yes
REQUESTED	-	-	-	-	-	Yes	Yes	Yes	Yes	Yes	-	-	-	Yes

** N = New Role, C = Current Role.

b. Proposed Changes to the WIGS Procedure

Item	QC ID	Description	Participant Comments
1		**MINOR CHANGES**	
1.1	N/A	**Align version numbering with MSATS CATS procedures.** The proposed version of the WIGS Procedures is v4.7.	Noted.