

29 January 2020



Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Sir/Madam

**Energy Queensland submission to the National Electricity Market (NEM)
Customer Switching Consultation**

Energy Queensland welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the Draft Report and Determination for a package of amendments to the Market Settlement and Transfer Solutions (MSATS) Procedures (referred to as the NEM Customer Switching consultation).

This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited (Energex), Ergon Energy Corporation Limited (Ergon Energy), Ergon Energy Queensland Limited (Ergon Energy Retail) and Yurika Pty Ltd.

Energy Queensland's comments on the proposed amendments to the MSATS Procedures are provided in the attached Participant Response Template.

Additionally, we take this opportunity to raise concerns with the proposed release date for the NEM Customer Switching MSATS changes which result in a new schema. AEMO's proposed release date for this schema results in the need to develop, test and deploy changes whilst undertaking significant work to implement the 5 Minute Settlement (5MS) and Global Settlement (GS) frameworks. In particular, the customer switching program of work will require market testing in September 2020, with production and deployment then bordering the market testing phase for 5MS and GS.

We are therefore of the view that the NEM Customer Switching changes should be incorporated into one program of work with 5MS and GS to avoid further stretching resources across multiple development and testing streams. As such, we recommend that all the changes required to MSATS for the NEM Customer Switching, 5MS and GS be jointly deployed from 1 July 2021.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on (07) 3851 6787 or Andrea Wold on (07) 3664 4970.

Yours sincerely

A handwritten signature in cursive script that reads "Trudy Fraser".

Trudy Fraser
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Encl: Energy Queensland comments in the Participant Response Template

NEM CUSTOMER SWITCHING

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Energy Queensland Pty Limited on behalf of its
participant entities

Submission Date: 29/01/2020

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1. Context

This template is being provided to assist stakeholders in giving feedback about the changes specified in the 'NEM Customer Switching' Draft Procedures.

The changes being proposed seek to enable the implementation of efficient delivery of proposed changes to the customer switching process design in the National Electricity Market (NEM).

2. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
4.13 (d)	Existing Interval (EI) read type for BASIC meter	Energy Queensland seeks clarification of what should occur when an EI read type code is received for a BASIC meter.
4.13 (d)	Validation of Read Type Code for Change Request (CR) for a Meter Read Type	<p>Energy Queensland notes that Table 4-N has been updated to reflect the valid combinations of Read Type Code to CR code to Meter Read Type. However, given that there are no objections available to these CRs, there is potential for Metering Data Providers (MDPs) to receive a meter reading request on a customer transfer that cannot be fulfilled. For example, CR1000 received with PR read type code for a BASIC meter.</p> <p>Energy Queensland believes that either:</p> <ol style="list-style-type: none">1) The proposed no objections should remain on Customer Transfers, with the Australian Energy Market Operator (AEMO) completing validation on these CRs to ensure that only valid combinations of ReadTypeCode/CR/Meter Read Method is received, or2) The proposed no objections remain on Customer Transfers, with MDPs able to complete a substitution on any Read Type Code received.

Section	Description	Participant Comments
		Energy Queensland supports proposal 1) above where AEMO is completing the validation of Customer Transfer CRs upon submission. This will ensure that there is incentive to provide the correct information in the CR, as well as ensure the MDP fulfils its obligation to meter readings as required.
6.1.1	Validation on retrospective Day CR1000 transactions	<p>Energy Queensland would like confirmation on how the market will enforce that a Retrospective Day CR1000 must be Remotely Read when no objections are available to Participants if a CR is provided that is for a meter that is not remotely read.</p> <p>Per previous comments in section 4.13 (d), Energy Queensland supports proposal 1) where AEMO complete validation of the Customer Transfer CR upon submission.</p>
6.1.1	Validation on CR1010 transactions	<p>Energy Queensland seeks confirmation on how the market will enforce that a CR1010 must take place on the date of a previous meter reading if that previous meter reading does not exist.</p> <p>Per previous comments in section 4.13 (d), we support proposal 1) where AEMO complete validation of the Customer Transfer CR prior to submission.</p>
6.1.2	Conditions precedent for CR1010 transactions	<p>Energy Queensland seeks confirmation on how the conditions precedent for a CR1010 related to it being SMALL and manually read will be enforced.</p> <p>Per previous comments in section 4.13 (d), we support proposal 1) where AEMO completed validation of the Customer Transfer CR data upon submission.</p>
6.1.3 (c)	Validation on retrospective Day CR1000 transactions	Please refer previous comments in 6.1.1.

Section	Description	Participant Comments
6.1.4 (b)	Special Reading (SP) meter reading date	Energy Queensland seeks confirmation that the SP clause now allows the SP meter reading to be taken on any date after the CR1000 or CR1030 transaction date, provided it is in response to a special read/transfer read request raised by the same Financially Responsible Market Participant (FRMP). Further to this, we believe that the amendment to this clause indicates that the current -3+2 day window restriction no longer applies.
6.1.4 (c)	Substituted readings for a read type code	Energy Queensland seeks confirmation on whether the read type code of Read Required (RR) is the only read type code where the Retailer will expect a substituted reading on a Customer Transfer CR.
6.1.5	Metering Coordinator (MC) requirements for CR Change Retailer – Small or Large National Metering Identifiers (NMIs)	Energy Queensland believes that this clause related to MC Requirements is no longer required as the MDP, MPC (Category C Metering Data Provider) and MPB (Category B Metering Provider) roles can no longer be changed using the CR1000 series CRs (as per section 6.1.3 - FRMP Requirements).
6.1.7	Validation on retrospective Day CR1000 transactions	Please refer previous comments in 6.1.1.
7.2	Triggers for CR1500 transactions to complete CR1000 series transactions	Energy Queensland seeks confirmation of the specific situations (CR code/Read Type/Metering Type) when an MDP is to provide a CR1500 to trigger the completion of a CR1000 series CR, given that there is no longer a logical connection between a CR with a Proposed Date and a CR1500 requirement.
General	Transitional arrangements for inflight CRs	Energy Queensland seeks further clarification on the transitional activities related to the Customer Switching changes. More specifically, we would like clarification on what transitional and inflight requirements will exist at Go Live for those CRs, read types and objection codes existing on inflight transactions that are now either invalid or have a different meaning.

Section	Description	Participant Comments
General	Marked Changes	Energy Queensland notes that the way in which marked changes were handled in the Stage 2 consultation made it difficult to review the changes between Stage 1 and Stage 2 consultations. We suggest more clarity is required for the FINAL determination.
General	Effective Date of Document	Energy Queensland notes that the Effective Date of the document, 2/12/2020, is misaligned with the 5 Minute Settlement (5MS) and Global Settlement (GS) release date by three days. We suggest that this date is aligned with the 5MS and GS timeframe of 5/12/2020 which would facilitate better release scheduling, outage management and support for participants.
General	Version updates post Customer Switching	Energy Queensland queries how version updates will be managed to this document after it becomes effective in the market? For example, Table 4-L Metering Installation Type Code has additional changes to the Manually Read Flag column in the 5MGS changes which have been removed as part of this consultation.

3. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
2.1	Section reference error	Energy Queensland notes the beginning of section 2.1 has a reference that requires updating.

4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E	Additional Reason Code 67	Energy Queensland provides no comment.
General	General	Energy Queensland notes that the Effective Date of the document is still referring to the previously proposed Effective Date.

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Actual Meter Reading	Energy Queensland provides no comment.
5. Glossary	Current [Participant/Role]	Energy Queensland provides no comment.
5. Glossary	Initial MC	Energy Queensland provides no comment.
5. Glossary	Manually Read	Energy Queensland provides no comment.
5. Glossary	Meter Data Type	Energy Queensland notes that the addition of "Metering Data Type" in the Glossary has been completed on Page 22 and is duplicated on Page 23. We suggest removal of one duplicate value.
5. Glossary	New [Participant/Role]	Energy Queensland provides no comment.
5. Glossary	Previous Read Date	Energy Queensland provides no comment.
5. Glossary	Previous Read Quality Flag	Energy Queensland provides no comment.
5. Glossary	Read Type Code	Energy Queensland notes that the "Types of" at the start of this sentence should be removed.
5. Glossary	Remotely Read	Energy Queensland provides no comment.