

NEM CUSTOMER SWITCHING

PROCEDURE CONSULTATION

DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

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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
6.1.7	Objection Rules	AusNet Services notes that AEMO has covered the scenario where a FRMP attempts to incorrectly nominate an Initial MC (LNSP) for a NMI where the MC was previously a contestable MC. However, the reverse scenario, where a contestable MC is nominated for a site with non-contestable metering type (particularly VICAMI where there is no intention to churn the meter to Type 1-4). This has the potential to expose the LNSP's MDP and MPB unnecessarily to possible SLA breaches. To resolve this scenario, once it has been identified, the FRMP will need to raise a CRC 63XX to return the initial MC back into the role. Rather than simplify the transfer process, the option put forward by Simply Energy and adopted by AEMO seems to move the role assignment issue further down the chain. AusNet Services proposes to limit the scope of switching CR's in MSATS so that only the retailer role is changed in the transfer process, as per AEMO's initial Option 1.
6.1.8	Change Request Status Notifications.	AusNet Services proposes that the LNSP retain all Notifications for Pending Role Changes for CRC's 10XX. In instances where the MC = LNSP, there are processes in place that rely on early notification of a FRMP change to ensure that a previously requested De-energisation

		for the current FRMP is cancelled when a pending FRMP change is identified. This process requires the notifications be received in the role of the LNSP. If the LNSP loses visibility of the pending change they may inadvertently disconnect a newly installed customer, increasing wrongful disconnections. This is not considered an acceptable risk considering the intent of the change is to stop 'save' processes which the LNSP does not perform.
Table 6	Objection Rules for CRC 1010	AusNet Services proposes that the Current MDP role retain the 'BADMETER' objection code for this CRC in order to object to instances where a CRC 1010 has been raised on a Remotely Read Metering Type.
Table 6	Objection Rules for CRC 1000	AusNet Services proposes that the Current MDP role retain the 'BADMETER' objection code for this CRC in order to object to instances where Retrospective CRC 1000 has been raised on a Manually Read Metering Type.

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

Section	Description	Participant Comments
		No comment.

4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E	Additional Reason Code 67	All other descriptions refer to 'Meter Readings' rather than 'Read', suggest rewording to "Meter Readings provided to facilitate a customer transfer".

5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Actual Meter Reading	Agreed.
5. Glossary	CATS Standing Data Access Rules	Agreed.
5. Glossary	Current [Participant/Role]	Agreed.
5. Glossary	Initial MC	Agreed.
5. Glossary	Meter Data Type	This term does not exist in the second stage consultation document version; https://aemo.com.au/-/media/Files/Stakeholder_Consultation/Consultations/NEM-Consultations/2019/NEM-Customer-Switching/Second-Stage/Retail-Electricity-Market-

		Procedures--Glossary-and-Framework-v23-Draft-Consultation-Change-Marked.pdf
5. Glossary	Metering Data Type	This entry seems to be duplicated – once between ‘MAMP’ and ‘MarketNet’ and a second time between ‘Metering Data Notification Process’ and ‘Metering Data Validation Process’. Suggest removing the first entry.
5. Glossary	New [Participant/Role]	Agreed.
5. Glossary	Previous Read Date	This field is intended to hold the date the last Meter Reading occurred, not the time meter reading was provided. It currently reads as the time the meter reading was provided, e.g. Meter Read on the 15/12/2019 Data Provided by MDP to Participants on the 16/12/2019. Suggest rewording to “A date held in MSATS indicating the last time a meter was read”
5. Glossary	Previous Read Quality Flag	Suggest including how the quality flag is determined. Suggest rewording to “A quality flag determined by MSATS for the <i>Previous Read Date</i> as provided by the <i>MDP</i> to the market”
5. Glossary	Read Type Code	This description as per the draft does not read fluently and ‘MDP’ and ‘meter reading’ are defined terms and should be italicised. Suggest rewording to “Provides direction to the <i>MDP</i> on the type of <i>meter reading</i> to be used to facilitate a transfer. Applicable Read Type Codes are detailed in Table 4-M of the CATS Procedures”.
5. Glossary	Remotely Read	If we have provided a definition of ‘Remotely Read’, should we also include the definition for ‘Manually Read’?

		Suggest rewording to “Collection of <i>metering data by remote acquisition</i> ”
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