

Wednesday, 29 January 2020

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Chief Executive Officer  
Australian Energy Market Operator  
Level 22, 530 Collins Street  
Melbourne VIC 3000

Via email: [NEM.Retailprocedureconsultations@aemo.com.au](mailto:NEM.Retailprocedureconsultations@aemo.com.au)

Dear Ms Zibelman,

**RE: NEM CUSTOMER SWITCHING PROCEDURE CONSULTATION**

TasNetworks welcomes the opportunity to make a submission to the Australian Energy Market Operator (**AEMO**) on the National Electricity Market (**NEM**) Customer Switching Procedure consultation.

TasNetworks is the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner (**JP**) in Tasmania. TasNetworks is also the proponent assessing the business case for Marinus Link, a new interconnector between Tasmania and Victoria. The focus in all of these roles is to deliver safe and reliable electricity network services to Tasmanian and NEM customers at the lowest sustainable prices. TasNetworks is therefore appreciative of AEMO's efforts to review the protocols for switching customers in the NEM.

In general, TasNetworks is supportive of the proposed changes to Market Settlement and Transfer Solutions (**MSATS**) specifications, meter data file formats and the glossary changes. The one exception concerns the proposed Change Request (**CR**) 1060 transaction. Instead of introducing a new CR, TasNetworks suggests that an existing CR such as 1026 be repurposed to reverse the Financially Responsible Market Participant (**FRMP**) role as a result of customer cooling off. TasNetworks considers that such an approach would have efficiency benefits from reducing development and testing effort as well as minimising impacts to 5 Minute Market Settlement (**SMS**) timelines and deliverables.

TasNetworks' responses to individual questions are provided in the attached participant response template. We welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact Bryce Turnbull, Market Systems Compliance Manager, via email ([bryce.turnbull@tasnetworks.com.au](mailto:bryce.turnbull@tasnetworks.com.au)) or by phone on (03) 6271 6218.

Yours sincerely,



Tim Astley  
Team Leader, NEM Strategy and Compliance

# NEM CUSTOMER SWITCHING

## PROCEDURE CONSULTATION

### DRAFT DETERMINATION STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** TasNetworks Pty Ltd

***Submission Date:*** 28/01/2020

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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
7	Reverse and Provide Data – Proposed new CR 1060	<p>TasNetworks requests that AEMO consider repurposing an existing change request (example 1026) for the purpose of reversing the FRMP role due to customer cooling off, in place of the proposed new CR 1060 transaction.</p> <p>TasNetworks considers that by doing this it may alleviate the need for participants outside of Victoria to develop and implement a new transaction into their existing systems.</p> <p>Should this option be viable, it would allow some participants the option of remaining on the existing (n-1) schema version until participants’ systems are upgraded as a consequence of 5MS changes.</p> <p>TasNetworks feels this would be beneficial from the point of reducing the development and testing effort for such participants and software vendors, along with reducing impacts to 5MS project timelines and deliverables.</p>


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

Section	Description	Participant Comments

#### 4. Meter Data File Format Specification NEM12 & NEM13

Section	Description	Participant Comments
Appendix E	Additional Reason Code 67	

#### 5. Retail Electricity Market Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Actual Meter Reading	
5. Glossary	Current [Participant/Role]	
5. Glossary	Initial MC	
5. Glossary	Manually Read	
5. Glossary	Meter Data Type	
5. Glossary	New [Participant/Role]	
5. Glossary	Previous Read Date	
5. Glossary	Previous Read Quality Flag	
5. Glossary	Read Type Code	
5. Glossary	Remotely Read	

