METERING ICF PACKAGE CHANGES

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Metering ICF Package Changes consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.4.(s)	Updated to include a new sub clause(s) for obligation on MDP to provide relationship mapping between Register ID and Datastream Suffix.	AEMO's proposed change to revert the definition is supported by Origin. The new definition is yet to be implemented (1/5/22) as part of the version 5.0 of the Standing Data for MSATS. Due to the 5MS project, AEMO will require MDPs to provide relationship mapping between the Register ID and the Datastream Suffix earlier (1/10/21).
2.9.(k)	Updated to include a different timeframe for cancelling an incomplete CR6800.	Origin does not support the proposed change and recommends the timeframe (220 days) remains unchanged. This issue of CR cancellation prior to install is not a result of a failure in the market structure, but instead of poor planning of work by the MC. The MC is required to provide AEMO with a plan for resolution of the family failures. Appropriate process control to ensure only work expected to be completed within the CR window is raised, is the correct solution. An extension

Section	Description	Participant Comments
		of the CR window also increases the risk of FRMP churn and associated role changes.
4.3 Table 4-C	Updated 'Description' for Code 'BADPARTY' for current MC to object to change of MC for SMALL NMI's only in Victoria.	Origin supports the proposed change. The change could also be expanded to allow only the FRMP to object as BADPARTY for all SMALL NMI's. Under the Rules, an MC is not allowed to self-appoint to any small NMI, but no control exists to prevent it. Data can be provided to show that MC's are still self-appointing to small NMIs in all States. This variation could also be applied in the large market as Origin reports that MCs occasionally self nominate in this market too.
4.4 Table 4-D	Updated to reflect the current jurisdictional requirements for Small and Large customers.	Origin does not support this change as most Participant systems are built around the current table in the MSATS Procedures with 160/100MWh as the threshold between small and large customer annual consumptions.
13.3.6 Table 13-H	New entry related to objection code 'BADPARTY' for CR6300 and CR6301.	See above (under 4.3 table 4-C).

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures	Origin supports the change to align version numbering across the two Procedures, MSATS & WIGS.

4. Metrology Procedure: Part A

Section	Description	Participant Comments
12.5	Update to replace 'verification' with 'Validation'. Amend the section heading and introduction paragraph to better align with terminology used in SLP MP clause 4.2(b)	Origin supports the change to align MSATS terminology with SLPs.

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.4	Update to remove 'N' Metering Data Quality Flag	Origin supports the change to remove the 'N' Quality Flag as it is superfluous in the current market Procedures.
13.2.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	Origin supports the change to remove the requirement for 'End User Details' from the Inventory Table. This attribute should be flagged as optional for Market Participants as development may be completed in systems already per the 5MS project in some cases.
13.3.2(a)(iii)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	As above
13.5.2(a)(v)	Update to remove 'End User Details' from Inventory Table. Reverse 5MS/GS changes.	As above

6. Service Level Procedure Meter Provider Services

Section	Description	Participant Comments
4.2(a)(iii) & (b)	Update to replace 'verification' with 'Validation'.	Origin supports the change in definition to eliminate any confusion between MP and MDP roles
4.2(c)(ii) & (d)	Update to replace 'verify' with 'Validate'.	As above
4.4	Update to replace 'verify' with 'confirm'.	As above

7. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
17.2(a)	Updated to change the section from 19 to 16.	Origin supports the proposed change. As a failed Retailer is unable to participate in the market, this change is consistent with preventing further transactions by that entity.
17.2(b)	Updated to include 'AEMO must' in the sub clause.	As above
17.2(c)	Include new sub clause to remove MSATS access for the Failed Retailer.	As above

8. Meter Data File Format Specification

Section	Description	Participant Comments
3.3.1(b)	Updated to remove the sub clause (b).	Origin supports the change – refer ICF_025 (see Metrology Procedures Part B 2.4 comments above).
4.4	Updated to remove the text in Definition column related to Meter Data Quality Flag 'N' against the Field InternalValue1….InternalValueN Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode Updated to remove the text in Definition column related to Quality Flag 'N' against Field UpdateDateTime	As above
4.5	Updated to remove 'N' from Allowed Values against the Fields QualityMethod and ReasonCode	As above
Appendix C	Update to remove the row related to Quality flag 'N'.	As above

9. Standing Data for MSATS

Section	Description	Participant Comments
8.1	Amend the description of Average Daily Load in Table 15	Origin supports the changed definition to align across the market systems and procedures.
9.1	Amend the description of RegisterID in Table 18	As above

10.   Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
5	Amend definition of the term Average Daily Load (ADL).	As above

11.   Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
Are there better options to accommodate the change proposals, that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?	ICF_016 Alternative: A validation on MSATS to reject a CR630x submitted on a NMI classified as SMALL unless submitted by the FRMP. This would ensure no participants are required to make system changes to support the change, outside of MSATS which would require changes to support this anyway. ICF_016 Change (if alternative not pursued): Allow the FRMP to object badparty to all small NMIs as only the FRMP has the right to nominate, but has no control to prevent unwanted nomination. This allows for a unified process across all jurisdictions and better protection of small customers. ICF_027 Include a table to distinguish the requirements for CT metering versus whole current metering. This enhancement to the change in definition would assist the new connection metering assignment.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Sequencing of changes across the market systems and Procedures to avoid repetition and maximise efficiency across planned changes. Review the Road Map as required.