

# RETAIL ELECTRICITY MARKET PROCEDURES OCTOBER 2021 CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Origin Energy

***Submission Date:*** 15 November 2021

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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 Retail Electricity Market Procedures October 2021 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. Questions on proposed changes

Heading	Participant Comments
Does your organisation support the proposals contained in the Issues Paper? If not, please specify areas in which your organisation disputes AEMO's assessment (include ICF reference number) of the proposal and include information that supports your rationale why you do not support AEMO's assessment.	Origin is supportive of these changes.
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?	No comments
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	No comments
Do you have any further questions or comments in relation to the proposals described above?	Origin has some questions documented below in the relevant sections.
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please include your feedback / suggestions. Please	Origin broadly supports the proposed changes, with inclusion of NCONUML requirements. This is in line with OE's pending ICF that proposes GPS Latitude and Longitude to be included in

Heading	Participant Comments
<p>note that this feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process.</p>	<p>MSATS standing data for NCONUML connection points.</p>

### 3. Feedback on proposed amendments

Document	Participant Comments
<p>B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)</p>	<p>Origin supports these changes and the efficiencies it will enable.</p>
<p>Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)</p>	<p>Origin supports these changes.</p>
<p>Meter Data File Format Specification (MDFF) NEM12 &amp; NEM13 (CIP_042 Reason Code)</p>	<p>Origin supports these changes, and also suggests a further amendment to the reason codes (details in section below).</p>
<p>Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)</p>	<p>Origin supports both of these proposals, however for CIP_046, Origin suggests that there should be some clarification whether NCONMUL is included.</p>
<p>Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard)</p>	<p>Origin supports both of these proposals, however has some questions / suggestions (details in section below).</p>

#### 4. Feedback on consolidations

Document	Clause	Participant Comments
CATS		Noted
WIGS		Noted
Metrology Part A		Noted
Metrology Part B		Noted
MSATS Procedures: MDM Procedures		Noted
NEM RoLR Processes Part A and Part B		Noted
Retail Electricity Market Procedures – Glossary and Framework (Glossary and Framework)		Noted
Standing Data document		Noted

#### 5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
Appendix E Reason Codes	Reason codes amended and removed as described above	Origin supports these changes, and also suggests a further update to the reason code 8 (Vacant Premises) to amend the description to advise Meter reader

Section	Description	Participant Comments
		believes the Site is vacant and was unable to access the meter.
Appendix F Obsolete Reason Codes	Reason codes removed from Appendix E to be moved to Appendix F as described as above	Origin Energy supports these changes.

## 6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments
1.1 Purpose and Scope(c) & (d)	Change of wording to refer to Appendix B and the B2B eHub Self-Accreditation	Origin supports the change in wording.
2.4 Pre-Production Assessment General (a)	Replacement of the requirement to test all transactions, to test a subset of transactions.	Origin supports this replacement.
2.5 Applicant System Testing	Removal of requirement of Stage 1 testing requirements.  Change of wording to align with requirement of testing subset of transactions, not all transactions	Origin supports the removal of the Stage 1 testing requirements and the change of wording.  Origin also supports the change of the wording.
Appendix B	Removal of the Mandatory/Required column	Origin supports the removal of this column.

## 7. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.5 title	Verification of Metering data for whole current Manually Read Metering installations for small customers and Type 7 Metering installations	Origin supports this change.
3.1 (b) and (c)	CIP_046 Clarification of Metrology Part A Clause 12.5.  CIP_048 Reference to AS60044.	Origin supports both of these changes, however for CIP_046, Origin suggests that there should be some clarification whether NCONMUL is included.

## 8. Standing Data document

Section	Description	Participant Comments
Table 17	CIP_049 Controlled Load Enumerations.	Origin supports simplification of the change, however notes that further discussion may be required regarding the below points: <ul style="list-style-type: none"> <li>- How will switching between CL options in Qld would be identified/reflected</li> <li>- How will internal meter switching be recognised? Suggestion that 'YES' should be replaced with 'INT' to assist in clarifying.</li> </ul>
Table 3	CIP_053 GPS Coordinates Minimum Requirements.	Origin supports having a minimum and maximum limit documented and suggests that it would be beneficial if this could apply to NCONUML sites also.
Table 6	Connection configuration clarification.	Origin supports this change, however also suggests that it would be beneficial to include the meter type and element on the meter level information. This

Section	Description	Participant Comments
		would allow accurate customer billing and reconciliation between metering providers and networks. Pricing for metering is set based upon meter type. Currently this information is not held in the standing data.
Version 5.11	Consolidation of versions	Origin notes this change

### 9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
4.5	Descriptions updated for GENERATR and NREG	Origin notes this change
Version 5.1	Consolidation of versions	Origin notes this change

### 10. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)

Section	Description	Participant Comments
Version 5.1	Consolidation of versions	Origin notes this change

Section	Description	Participant Comments
8.21 8.2.4	Added references to AEMO initiating roles	Origin notes this change
8.2.3	Removed references to current MC initiating a Change Request for transmission network connection points, added references to AEMO initiated roles.	Origin notes this change

## 11. Metrology Procedure: Part B - National Electricity Market (Metrology Procedure: Part B)

Section	Description	Participant Comments
Version 7.3	Consolidation of versions	Origin notes this change

## 12. MSATS Procedures: (Meter Data Management) MDM Procedures

Section	Description	Participant Comments
Version 4.3	Consolidation of versions	Origin notes this change

### 13. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
Version 2.3	Consolidation of versions	Origin notes this change

### 14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

Section	Description	Participant Comments
Version 3.5	Consolidation of versions	Origin notes this change