



17 December 2021

Australian Energy Market Operator

via email: NEM.Retailprocedureconsultations@aemo.com.au

Re: MSATS Standing Data review implementation date

CitiPower, Powercor and United Energy welcome the opportunity to respond to the Australian Energy Market Operator's (AEMO) minor amendments paper to change the effective date of the Market Settlement and Transfer Solutions (MSATS) Standing Data Review (MSDR) from 1 May 2022 to 7 November 2022.

Further delays will add costs to the implementation of the MSDR

We are not supportive of any delay to the effective start date of the MSDR. A delay will result in unnecessary costs for all industry participants, and ultimately impact the affordability and quality of the services received by our customers. It is not prudent, or in the interests of our customers, for AEMO to delay anticipated changes to market procedures, particularly as we face significant anticipated changes to the wholesale market, as part of the post-2025 National Electricity Market (NEM) design, that will require frequent system upgrades.

We are already making substantial investments to prepare our systems for the MSDR changes to take effect on 1 May 2022, which include management of multiple IT systems. IT system upgrades take significant planning and forward investment to ensure a smooth go-live delivery. Delaying these system changes requires daily maintenance of the legacy systems and repeated testing of the new systems until a new implementation date is established. We must also continue to pay additional costs to vendors that would not otherwise be necessary.

Based on the proposed delay, we anticipate the cost to our customers would be **approximately \$1 million**. These are unnecessary and wasteful costs that are purely related to the delay. AEMO must take these costs into account in its decision to delay any implementation of system upgrades for the MSDR.

The go-live date should be on a Saturday or Sunday

The proposed delayed implementation date, 7 November 2022, falls on a Monday. To minimise impact to business-as-usual operations during the week, we propose any final implementation date is either a Saturday or a Sunday. Our experience shows go-live dates that take place during the week are significantly more disruptive to daily operations than if the implementation took place during the weekend when activity is lower.

'ICF_16 Reinstate MC Objection of BadParty for Victoria SMALL NMIs' should be effective on 1 May 2022

If the implementation of the MSDR is to be delayed, we recommend *ICF_016 Reinstate the MC Objection of BadParty for Victorian SMALL NMIs* still become effective on 1 May 2022. The reinstatement of the objection code should be a minor change for AEMO, but it would allow us and other Victorian distributors to implement this change that will minimise disruption to our customers from inappropriate metering installations. Until the objection code is reinstated, we will need to continue to replace objectionable meters on our network, increasing cost and customer disruption.

Should you have any queries about this letter please do not hesitate to contact Sonja Lekovic on 0418 166 169 or slekovic@powercor.com.au.

Yours sincerely

Brent Cleeve

Head of Regulatory Policy and Compliance, CitiPower, Powercor and United Energy