2024 Metering Services Review Package 1 Consultation

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: TasNetworks

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft of the 2024 Metering Services Review Package 1.

2. Feedback on the Implementation of the AEMC Metering Services Review Rule

Question - LMRP	Participant Comments
1) What is your preferred format (e.g. YYYY or Q#-YYYY or DD-MMM-YYYY) to meet the requirement of the ASMD Draft Rule for the LNSP?	The draft rule includes a definition of *Interim Period* (being each financial year within the LMRP Period). Accordingly, TasNetworks believes the format of the field for the LMRP only needs to indicate the interim period by way of a single digit (e.g. 1, 2, 3 etc.). Having a value of YYYY may cause confusion and require two-year groups to be aggregated for reporting against an interim period. If a day and month is included, it is not clear whether it is intended to signify the start of an interim period or the end of the period. TasNetworks understands that some DNSPs have a preference to be able to define interim periods in a more granular form of quarterly periods. TasNetworks is also accepting of this approach, but this approach would need to also allow for a quarterly period not being specified (e.g. set the Q value to 0). TasNetworks has no preferred format and can cater for whatever is introduced for setting this value in MSATS via the BUT, as long as there is flexibility to assign NMIs to an individual yearly interim period.
2) Are the proposed tools (BUT and CRs) adequate to update the LMRP field?	TasNetworks supports the use of the BUT for populating the LMRP field in MSATS. TasNetworks does not believe there is a case for CRs to be developed for this purpose. If the LMRP field needs to be updated then it is likely that this would

Question - LMRP	Participant Comments
	need to be done for groups of NMIs not on an individual basis, and therefore the BUT should be configured to facilitate this in all cases.
3) Is AEMO coordination required for DNSPs to load LMRP into MSATS from May 2025 to 29 June 2025?	It would be preferable for AEMO to coordinate an allotted schedule for each DNSP to utilise the BUT for the initial population, to alleviate congestion and transaction volumes for those participants utilising C1 report replication.
4) Are standing data quality reports required to be created for participants to meet their procedural obligations for LMRP? If so, what are the components of these reports?	From a DNSP perspective it may be preferable that AEMO verify that 100 per cent of NMIs with legacy meters have been populated with an LMRP value in MSATS. This could be a once-off report for the initial load and then considered as an ongoing SDQ report if deemed necessary.
5) Are there other considerations or approaches which could be taken to meet the requirements of the ASMD Draft Rule?	No comment.

Question - Defects	Participant Comments
1) Do you agree with the proposed Defect flag allowing an MC to record a defect in MSATS?	TasNetworks believes this approach aligns with the requirements of the draft rule, noting that this is only for the contestable MC to populate this, not the DNSP as a site's Initial MC.
2) Do you agree with the proposed approach of creating two new standing data attributes of Site Remediation Status and Site Remediation Status Date to track site defects?	TasNetworks considers that the approach taken in relation to tracking the remediation of site defects should align with the preferences of retailers, in accordance with the rule's intent.
3) Do you agree with the proposed enumerations which indicate the steps in the Site Remediation Status process?	TasNetworks does not have a position on the enumeration of steps in the site remediation process and considers that AEMO should be guided in this regard by the preferences of retailers, in accordance with the rule's intent.
4) Are standing data quality reports required to be created for participants to meet their procedural obligations for defects? If so, what are the components of these reports?	TasNetworks believes that it will not have any procedural obligations in relation to site defects and, therefore, will not have any SDQ reporting requirements.
5) Which option is preferred to manage now the defect field, site remediation status field and site remediation date field is nullified when a smart meter replaces a legacy meter which had a defect? Why is this option preferred?	TasNetworks believes that option 1 would be the preferred approach. This would negate the need for participants to send transactions and reduce any time delay of the records being nullified. TasNetworks does, however, note that option 1 would also need to include CR3001 transactions. Alternatively, a daily check of MSATS could be done on all NMIs where the defect fields are not null and the meter class code is not a legacy meter type, and if true, then null the defect fields.

6) Do you believe an alternative option/approach would better achieve the desired objectives? If yes, please provide your reasoning and details of your alternative approach	As per response the question 5, TasNetworks suggests an alternative approach for consideration, under which AEMO could perform a daily check on all non-extinct NMIs in MSATS to identify where the defect fields are not null and the meter class code is not a legacy meter type, and if true, then null the defect fields.

3. Feedback on the AEMO review of Retailer of Last Resort processes

Question	Participant Comments
1. Do you agree with the removal of the RoLR reports as proposed? If not, why?	TasNetworks agrees with the removal of the reports identified.

4. Feedback on the Issues and Change Forms (ICFs)

Question – ICF 077	Participant Comments
1. Do you agree that the proposed changes, to the CATS Procedure and MSATS system, will achieve the desired objective? If not, why?	TasNetworks agrees with the proposed change. We acknowledge this will reduce transaction volumes for the initial setting of the LCCD for new NMIs. To be effective, retailers will also need to ensure they disable any existing automated generation of CR5056/5057 transactions upon G to A transition, else the transaction reduction benefit will be diluted.

Question – ICF 078	Participant Comments
1. Do you agree with the proposed changes, will they achieve the desired objective? If not, why?	TasNetworks agrees with the proposed approach and believes it should achieve the desired objective.

Question – ICF 079	Participant Comments
1. Do you agree that the proposed changes to the Meter Data File Format Specification NEM12 & NEM13, will achieve the desired objective? If not, why?	TasNetworks acknowledges that the proposed changes should remove any interpretation discrepancy. We note however that the words 'then the 400 line must be provided' are superfluous and are not required, as it is stated that 'This record is mandatory where….'

5. Feedback on Embedded Network settlement anomalies

Question	Participant Comments
1. Do you agree with the proposed changes to limit: o the ability of ENMs to activate and de-activate NMI(s) retrospectively o the ability of MDPs to activate and de-activate datastreams in embedded networks retrospectively If not, why?	Although not directly impacted by this issue, TasNetworks considers that retrospective activation/deactivation of NMIs and datastreams may be required in the process of creation and removal of embedded networks for alignment with the parent NMI.