

## MSATS Standing Data Review

- MSDR Issues Paper
- MSATS Procedures – WIGS
- MSATS Procedures – CATS
- Standing Data for MSATS Guideline
- Retail Electricity Market Procedures Glossary & Framework

## CONSULTATION – Draft Stage

## CONSULTATION PARTICIPANT RESPONSE TEMPLATE

*Participant: Red Energy and Lumo Energy*

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## 1. Context

This template is to assist stakeholders in giving feedback to the questions raised in the Draft Report about the proposed changes to the MSATS Standing Data.

## 2. Questions raised in the MSATS Standing Data Review Draft Report

### 2.1 Material Issues

Information Category	Q No.	Question	Participant Comments
Type 4a Metering Installation (MRAM) Reason	1.	What are the key issues for AEMO to consider in working with stakeholders to explore with the AEMC the potential benefits of enhanced access to exception information?	Red and Lumo continue to support the addition of this field. This field would help to profile areas where telecommunication coverage is poor (poor or no signal), which assists retailers and MPs with making an early and correct decision regarding what type of service order to raise - such as remote re-en or attendance required. We consider that this will be something which will become more and more useful as the penetration of meters increases and jurisdictions allow for remote energisations.
Metering Installation Transformer Information	2.	In the cases where transformers have dual secondary windings or more (500kV : 110V : 110V), how would participants prefer to see those represented in the enumerated list for VT Ratio, keeping in mind that a transformer can have up to five secondary windings?	No comment at this time
Shared Fuse Details	3.	Through what mechanism can a MC or MP communicate with an LNSP to instigate shared isolation point status changes?	No comment at this time

GPS Coordinates	4.	Please explain the benefits for expanding the GPS coordinates field to cover all NMIs given this would be a significant cost? For example, some multi-floor buildings would have the same GPS coordinates so you may also need to have elevation for which floor (assuming metering on each unit)?	Red and Lumo see the introduction of the GPS coordinates as a potential for improving customer satisfaction and experience, and reduce costs. We currently manage calls with customers where certain jobs have not been performed due to the meter not being located by the field crew, further rework and orders being raised multiple times, adding to the cost of the work. This field would help to mitigate these issues, leading to a positive customer outcome.
	5.	AEMO has applied the definition of rural using the 'Designated regional area postcodes' to gain consistency in approach, however feedback indicates a mixed response to this option. Is there an alternate NEM wide definition that can be applied across the NEM? AEMO notes, for example, in Queensland NMIs are required to be classified as urban, short rural and long rural for Guaranteed Service Levels. Is there something similar to this in other jurisdictions and can it be applied there?	Red and Lumo believe GPS should be applied to all NMI's/meters. We recognise it may be more difficult in apartment blocks. We note that this is still possible when the GPS is matched with a well populated Network Additional Information field.
	6.	Do you agree with AEMO proposal? If yes, why? If no, why not? Please provide reasons.	Red and Lumo support the introduction of GPS coordinates, and believe this field should be applied to all NMI's/meters. We recognise it may be more difficult in apartment blocks. We note that this is still possible when the GPS is matched with a well populated Network Additional Information field.
Network Additional Information field	7.	What uses do participants (retailers, networks and metering parties) have for the Network Additional Information field?	Red and Lumo consider that this field would be useful, especially for manually read meters. We expect that this field will contain any access information and additional meter location information as a free text field. It may be

			possible to enumerate this information, however due to the multitude of permutations and access variances, free text may be more appropriate. All additional information that will assist in creating a positive customer experience, when communicating with customers about what could impede on access to the meter or confirm where it can be located.
	8.	Are there other fields that may be suitable to apply this information? For example, Meter Location field with an increased character length available for the field.	No comment at this time
	9.	Do you agree with retaining the Network Additional Information field?	Red and Lumo support retaining this field.

## 2.2 Data Transition

Information Category	Q No.	Question	Participant Comments
Scenarios	10.	For Removed fields, would you prefer Option 1 (retain history) or Option 2 (remove history)?	Red and Lumo consider that until a final decision has been made on which fields will be removed, then we are unable to make an informed decision in regards to this question. We consider that this will be the case for most other participants too, and we recommend that AEMO re-raise this question for consideration after the final decision on which fields will be removed.

Scenario 2: Add a new field (Proposed Fields)	11.	For Added fields, would you prefer Option 1, 2a, 2b, 2c, 3, 4 or 5?	Red and Lumo consider that until a final decision has been made on which fields will be added, then we are unable to make an informed decision in regards to this question. We consider that this will be the case for most other participants too, and we recommend that AEMO re-raise this question for consideration after the final decision on which fields will be removed.
	12.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	
	13.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	
	14.	If you choose Option 2c, please choose between for i(a) or i(b).	
	15.	Do you have any further comment regarding the above?	
Scenario 3: Amend an existing field (To Amend)	16.	For Amended fields, would you prefer Option 1, 2a, 2b, 3, 4 or 5?	Red and Lumo consider that until a final decision has been made on which fields will be amended, then we are unable to make an informed decision in regards to this question. We consider that this will be the case for most other participants too, and we recommend that AEMO re-raise this question for consideration after the final decision on which fields will be removed.
	17.	If you choose Option 2a, please choose between i(a) or i(b) and provide answers for ii.	

	18.	If you choose Option 2b, please choose between i(a) or i(b) and provide answers for ii and iii.	
	19.	Please provide any further details required	
Outbound Notification Options	20.	For Outbound Notifications, would you prefer Option 1, 1a, 2, or 3?	Red and Lumo consider that until a final decision has been made on which fields will be added, removed or modified, then we are unable to make an informed decision in regards to this question. We consider that this will be the case for most other participants too, and we recommend that AEMO re-raise this question for consideration after the final decision on which fields will be removed.
	21.	Do you have an alternate method of receiving Outbound Notifications? If so, please provide details	

### 2.3 Other Matters

Information Category	Q No.	Question	Participant Comments
Consumer Data Right	22.	Do you agree with the proposed new fields?	No, Red and Lumo do not agree with the addition of these new fields. The information pertains specifically to the customer themselves, and therefore should not be stored in MSATS. It is sensitive information that if misused or not subject to adequate controls, could jeopardise the privacy and/or safety of a consumer (in the context of family violence, for example).

			<p>Unlike authorised retailers, there are currently no provisions that apply to AEMO/MSATS to hold personal information. While this will likely be a focus of the forthcoming CDR Rules and of any technical standards for the transfer of data between holders and recipients, we cannot support the proposed new fields until this has been adequately addressed and until all parties with access to MSATS have obligations regarding consumer protections and personal information.</p> <p>This is also consistent with the legal advice that AEMO sought on the life support flag.</p>
	23.	What types of scenarios – including specific examples – could be envisaged which would raise complexities whose resolution would be required in order to achieve the data sharing objectives?	As per above, Red and Lumo object to these new fields to be added in MSATS.
	24.	What sorts of consequences – including potential unintended consequences – may need to be considered in respect of these fields?	<p>Having these fields in MSATS would be seen as a breach of personal customer information (and therefore is confidential) under current energy rules and established privacy framework. There could be numerous reasons for a change in the number or status of an account holder at a particular property. For example, a joint account holder may be removing themselves from a family violence situation and the inadvertent disclosure of a change to personal details could jeopardise their safety. Retailers have strict controls in place to ensure that all consumer data is protected in all situations.</p> <p>The framework to ensure consumers’ privacy and safety is maintained in all situations and which applies equal obligations to all CDR participants (including AEMO) does not yet exist.</p>

	25.	Do you agree with the timeframe for updating the data in these fields?	We do not agree with these fields being included, as such we have no comment on timeframe.
	26.	Are there other suggestions to help meet the ACCC's objective?	AEMO and the ACCC must consult extensively with retailers, consumer representatives and other stakeholders to develop a regulatory framework that achieves its objective while maintaining consumers' privacy and safety. This includes Rules relating to the authorisation of data recipients, the nature of consumer consent and data handling, in addition to safe and secure arrangements for the collection, retention and transfer of consumer data.
	27.	Given this change commenced on 1 December 2017, to what extent are you seeing issues with the population of the NTC?	Red and Lumo believe the accurate population of NTC is a major issue which needs to be addressed. It is not only a question of volume of incorrectly updated NTCs, but also the work which needs to be undertaken after the NTC has been rectified. This will impact on not only the retailer who needs to rectify the information in their billing systems, but also has a direct impact on the customers themselves. All further compounded if the issue is not picked and fixed in a timely manner.
	28.	<p>If AEMO was to review the obligations on NTC, out of the options proposed, which do you see being the most effective to address the current issues experienced. Please provide reasons as to why you think the options you've chosen would address the issue.</p> <p>a) Compliance options for MPB performance for incorrectly populating NTC</p> <p>b) Retailer obligations to inform the MC and MPB of the appropriate NTC</p>	Red and Lumo support options a), c) and d). Whilst we agree that the LNSP could be made responsible for this field, we also believe that the MPB should have a responsibility of updating the NTC whenever they make changes to the meter register. Therefore reinforcing the MPB's responsibility through compliance options, and assigning timing obligations on Networks to ensure the NTC field is correctly populated or fixed, will ensure that the NTC field is correctly populated and in a timely manner.

		<p>c) Network obligations to correct an incorrectly populated NTC within three business days; and or</p> <p>d) If networks are provided the obligation to populate NTC then they will have only three business days to correctly populate this after the metering installation details are provided by the MPB, this will ensure there are not additional delays to the commissioning of the meter in MSATS</p>	<p>We do not support having an obligation on the retailer to advise the MPB or MC of the appropriate NTC, as the retailer is not the owner of this field.</p>
	29.	<p>Do you have any comments on the options provided by Endeavour Energy?</p>	<p>Option 1: If the MPB makes changes to the meter register record, which would then require the NTC to be changed, how will the MPB advise the LNSP of the required to be updated to? We believe there should be an obligation on the MPB to update the NTC in the event of works they have undertaken themselves, such as metering change.</p> <p>We do not support option 2. As pointed out by AEMO, the level where the NTC should be captured is at the meter level and not NMI to account for when there may be multiple NTC's.</p>

### 3. Proposed Changes in MSATS Procedures - WIGS

Section No/Field Name	Participant Comments

#### 4. Proposed Changes in MSATS Procedures - CATS

Section No/Field Name	Participant Comments

#### 5. Proposed Changes in Standing Data for MSATS Guideline

Section No/Field Name	Participant Comments

#### 6. Other Issues Related to Consultation Subject Matter

Heading	Participant Comments
5.1.3 AEMO’s conclusion - Meter Locks	Red and Lumo strongly support this field being included and consider that AEMO should review its decision. It is our view that the benefit of having this field in MSATS, and updated, will derive real customer benefit, and reduce costs and meet the B2B Objective and National Electricity Objective. Being aware at the time of a service order being raised that the meter box has a lock on it which requires access to be provided, will ensure this can be advised to the customer and arranged ahead of time. This will save customers money with fewer wasted truck visits, works will be completed on time and as communicated to customers -- allowing retailers to meet their customer’s expectations.