

RETAIL ELECTRICITY MARKET PROCEDURES October 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Origin Energy

Submission Date: 21 December 2021

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the 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.	Broadly supportive of the proposed process improvements to the Market Procedures. Detailed feedback provided in relevant sections of this document.
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?	N/A
Do you have any further questions or comments in relation to the proposals described above?	Detailed feedback provided in relevant sections of this document.
Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback /	As noted in the 'MSDR implementation date minor amendments' consultation, due to the close proximity of the effective dates of these

Heading	Participant Comments
<p>suggestion warrant further investigations / discussion? If so, please include your feedback / suggestions. Please 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>Procedures (particularly the Standing Data for MSATS document that covers CIP_049 Controlled Load Enumerations and CIP_053 GPS Coordinates Minimum Requirements. Connection configuration clarification) with the 'Consumer Data Right' go-live, it is important to understand whether AEMO has performed adequate dependency management exercise to ensure the risks associated with industry operations (not limited to AEMO) are well understood and managed beforehand.</p> <p>Additionally, Origin suggests a clear and concise summary of 'market participants impacts' to be provided by AEMO to provide clarity on overlapping versions of various Procedures. That is, what does each release mean for market participants, e.g. 1st May 2022 (participants can upgrade to r42 schema to accomodate MCPI changes, however no AEMO impact); 7th November 2022 (no schema upgrade for market participants, however majority of AEMO-impacts due to MS DR changes). Also, for May 2022 schema upgrade, Origin understands that the industry/market cut-over support/plan will be facilitated by AEMO as a standard practice.</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>Feedback provided in Section 6 below.</p>

Document	Participant Comments						
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	Feedback provided in Section 9 and 10 below.						
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	No comments						
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	No comments						
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard and Connection Configuration Clarification)	<p>In the Draft Report, Sec 3.8 – Connection Configuration, Sec 3.8.1, makes reference to 'document' – should be 'Standing Data for MSATS'</p> <table border="1" data-bbox="1137 743 1738 865"> <thead> <tr> <th>Document</th> <th>Section</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>document</td> <td>Table 12</td> <td>Statements added as set out above</td> </tr> </tbody> </table>	Document	Section	Description	document	Table 12	Statements added as set out above
Document	Section	Description					
document	Table 12	Statements added as set out above					

4. Feedback on consolidations

Document	Version(s)	Clause	Participant Comments
CATS			No comments
WIGS			No comments

Document	Version(s)	Clause	Participant Comments
Metrology Part A			No comments
Metrology Part B			No comments
MSATS Procedures: MDM Procedures			No comments
NEM RoLR Processes Part A and Part B			No comments
(Glossary and Framework)			No comments
Standing Data document			No comments

5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
		No comments

6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments							
Appendix B Table 1 Page 20	<p>For Re-En, it shows Initiator or DM, or MP or MC.</p> <table border="1"> <tr> <td>Service Orders</td> <td>ServiceOrderResponse Re-energisation</td> <td>Recipient Discretion</td> <td>Re-Energise the customer using standard practice</td> <td>DM or MP or MC</td> <td>Retailer</td> <td>MDP/MP/MC</td> </tr> </table>	Service Orders	ServiceOrderResponse Re-energisation	Recipient Discretion	Re-Energise the customer using standard practice	DM or MP or MC	Retailer	MDP/MP/MC	Shouldn't this be DNSP?
Service Orders	ServiceOrderResponse Re-energisation	Recipient Discretion	Re-Energise the customer using standard practice	DM or MP or MC	Retailer	MDP/MP/MC			

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

Section	Description	Participant Comments
		No comments

8. Standing Data document

Section	Description	Participant Comments
Table 30	Origin noted that in the Draft Report, Sec 3.5 – Controlled Load, Sec 3.5.1 has a reference to Standing Data document, Table 17 – this is	This is the correct table reference

Section	Description	Participant Comments														
	<p>incorrect. Correct table is Table 30.</p> <table border="1"> <thead> <tr> <th>Document</th> <th>Section</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Standing Data document</td> <td>Table 17</td> <td>Table updated as described above</td> </tr> </tbody> </table>	Document	Section	Description	Standing Data document	Table 17	Table updated as described above	<p>Table 30 Valid Controlled Load Codes</p> <table border="1"> <thead> <tr> <th>ControlledLoad</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>NO</td> <td>The register is not associated with a network controlled load schemeNo controlled load</td> </tr> <tr> <td>YES</td> <td>The register is associated with a network controlled load scheme and the load is controlled internally within the meterThere is controlled load associated with a network-controlled load tariff on this register</td> </tr> <tr> <td>EXT</td> <td>The register is associated with a network controlled load scheme and the load is controlled externally from the meterThere is controlled load which is externally switched by the LNSP associated with a network-controlled load tariff on this register</td> </tr> </tbody> </table> <p>Furthermore, Origin likes to propose a wording change for the above table to ensure there is no ambiguity in the management of the controlled load as this does not always have to be done by the network. For example, instead of saying “network-controlled load tariff”, change it to “controlled load network tariff”.</p>	ControlledLoad	Description	NO	The register is not associated with a network controlled load schemeNo controlled load	YES	The register is associated with a network controlled load scheme and the load is controlled internally within the meterThere is controlled load associated with a network-controlled load tariff on this register	EXT	The register is associated with a network controlled load scheme and the load is controlled externally from the meterThere is controlled load which is externally switched by the LNSP associated with a network-controlled load tariff on this register
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9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
General (multiple sections e.g. Section	Unstructured addresses	<p>As noted in previous reports, AEMO proposed the below:</p> <ul style="list-style-type: none"> - Site address information in the unstructured format will no longer be allowed in MSATS from 7 November 2022.

Section	Description	Participant Comments
9.1.4)		<ul style="list-style-type: none"> - Any existing NMI with site address information in the unstructured format must be converted to the structured format by 7 November 2022. <p>However there are still references of 'unstructured address' through the document.</p>

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

Section	Description	Participant Comments
General (multiple sections e.g. Section 4.1.4)	Unstructured addresses	Same as above
General (multiple tables)	ENLR role clarity	Origin notes that the role of 'ENLR' has been updated throughout the document however it might be inconsistent where CR is not applicable for embedded networks e.g. Table 5-H; 5-J; 6-D; 6-F

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

Section	Description	Participant Comments
		No comments

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

Section	Description	Participant Comments
		No comments

13. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
		No comments

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

Section	Description	Participant Comments
		No comments