

RETAIL ELECTRICITY MARKET PROCEDURES OCTOBER 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Evoenergy

Submission Date: 15th 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.	Yes.
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 Comment.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Costly system and extensive business process changes required.
Do you have any further questions or comments in relation to the proposals described above?	No.
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 note that this feedback will be reviewed by AEMO at a later date, therefore will not be	No comment.

Heading	Participant Comments
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.	

3. Feedback on proposed amendments

Document	Participant Comments
B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)	Agree with changes as it adds clarity and minimises manual intervention.
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	Agree with changes as it adds clarity.
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	Agree with changes as it adds clarity.
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	Agree with changes as it adds clarity and meaning to clauses. It also aligns accountability.
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard)	Agree with changes as it adds clarity.

4. Feedback on consolidations

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

5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
3.3.1.(b)	Grammatical error.	Fullstop and space at beginning of clause should be removed.
Appendix E	Grammatical error – Reason Code 3.	Add fullstop at end of “...e.g. pandemic.” to align with remainder of table standard.

Section	Description	Participant Comments
		Also is there a space or carriage return after metering or is that just a PDF format issue?
Appendix E	Grammatical error – Reason Code 67.	Add fullstop at end of “...customer tranfer” to align with remainder of table standard.
Appendix F	Grammatical error – Reason Code 4 & 16.	Remove fullstops at end of Description to align with remainder of table standard.

6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments
		No comments.

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

Section	Description	Participant Comments
12.4	Part (b)(i), (ii) and (iii)	Suggest the following wording change.

Section	Description	Participant Comments
		<p>(b) The MC must ensure the transfer to AEMO of all <i>interval metering data</i> loads and all <i>accumulated metering data</i> loads.</p> <p>Or</p> <p>Why have two dot points that essentially say deliver all accumulated metering data. Delete point (iii) and modify point (ii) to read “accumulated metering data for all loads.”</p>
14	Shared Fused Arrangements – Diagrams	<p>I think the diagrams listing only meters adds confusion. One NMI may have multiple meters. Suggest leaving each box with Z or Smart meter/s, but under each have NMI 1, NMI 2 etc.</p> <p>Diagram 3 – If all the NMI’s are marked with Flag of I, why list it as an example as it means all NMI’s can be separately isolated. Why are they not N? Otherwise, it means that all multi-unit complexes or high rise buildings may fall into this category.</p>

8. Standing Data document

Section	Description	Participant Comments
All	Unstructured Address and other elements to be removed.	Those fields getting Removed, should examples be provided? Happy for them to stay in other tables, but is there going to be another consultation on the removals?

Section	Description	Participant Comments
2	Wording under “NMI may or may not have:”	The sentence beginning with “Records on...” should be listed as a dot point in the same way as the two above as it would clearly show requirements.
4.2	Table 4	<p>There is no data element for following to indicate format, max length or aseXML data element name.</p> <p>Current Transformer Test Date</p>
7.2	Table 13	<p>There is no data element for following to indicate format, max length or aseXML data element name.</p> <p>Connection Configuration DP Number GNAF PID House Number To Meter Malfunction Exemption Expiry Date Meter Malfunction Exemption Number Section Number Shared Isolation Point Flag</p>
8.3	Table 17 examples	Incorrect examples provided. This Table 17 should not be here, but be part of Table 14.
9.1	Table 18 – RegisterID and Suffix	<p>Dot point 2 for Interval meters in both again say “...Suffix must match RegistersID...”. This was not agreed with and repealed in other versions and consultations. Suggested wording for each is below.</p> <p>RegisterID – For Interval Meters, the RegisterID may match...</p>

Section	Description	Participant Comments
		Suffix – For Interval Meters, the Suffix in the CATS_REGISTER_IDENTIFIER table must match the ElectricityDataStream Suffix in the CATS_NMI_DATA_STREAM table.
9.3	Table 20 – TimeOfDay	Example for Interval meter is incorrect and does not align to allowed values in Table 29. Should be “INTERVAL”.
9.3	Table 20 – ControlledLoad	Example for Basic meter is incorrect and does not align to allowed values in Table 30. Should be “YES”.
12	Historical Information only	Where paragraph starts with “The NMISuffix was first used...” add heading 12.1 Historical Information and Guideline only. Add this as a heading and new clause number here where details how the NMISuffix was used.
15.1	Table 56 – TimeOfDay	The CL1 should be replaced with YES.
16	Table 1	Should be Table 57.

9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
All	Codes	Why are some Code tables listed in the Standing Data for MSATS, section 11, and others listed in this Procedure? If you have to specifically point this out

Section	Description	Participant Comments
		[4.7.2(c)], then move that Code into this procedure, otherwise move all the codes listed in this document into Standing Data for MSATS into section 11 [i.e. all in 1 location], and provide appropriate links from this document.
2.3	(b)	Add fullstop at end of sentence to align with other points.
4.5	Table 4-D – XBOUNDRY	Description has too many “to”s in table.
4.7.2	Table 4-H – Description of Code A	<p>Suggest rewording to clarify meaning</p> <p>Applies when an NMI Datastream Suffix is used in combination with the DataStreamType to determine whether a DataStream Suffix is to be used in the settlements process or where any other metering data has been configured to support the calculation of Unaccounted for Energy (UFE).</p>
4.7.2	Table 4-H – Description of Code I	Appears to be two fullstops after UFE.
4.7.3	Table 4-I – Description of Code C	<p>Why are there spaces and “” in the description? Are there some words missing?</p> <p>Suggest rewording all for further clarity and standard.</p> <p>Applies when the Meter Register associated with the NMI is current.</p>
4.7.3	Table 4-I – Description of Code R	<p>Suggest rewording to clarify meaning</p> <p>Appears to be two spaces after UFE.</p>
4.7.3	Table 4-I – Description of Code D	Suggest rewording to clarify meaning

Section	Description	Participant Comments
		Applies when the Meter Register associated with the NMI is <i>disconnected</i> .
4.11	Datastream Status Code	<p>Why have two headings the same, meaning the same, but different words. This clause should be part of 4.7.2. Suggest the following</p> <p>4.7.2, keep (a) delete (b) and replace with 4.11 (b); add 4.11 (c) (d); change 4.7.2 (c) to 4.7.2 (e) then delete 4.11.</p>

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

Section	Description	Participant Comments
All	1.4 – Codes	Same as CATS procedures.

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

Section	Description	Participant Comments
3.3	3.3.6 & 3.3.8	<p>Out of scope I know, but please pass onto the MSWG for consideration. These two (Type 16 and 18) should be merged as a Type 18, and add dot point below</p> <p>(d) as a result of Site or End User information, the original Substitutions are in error and a correction is required.</p>
6.1	Point (d) grammatical	<p>Start each dot point with capital letter to conform to other dot points here.</p> <p>Fix the wording and remove the “data” from paragraph. Change to</p> <p>“...Agreed Loads as follows:...”</p>
13.1.3	Point (d) grammatical	<p>The word “each” is listed twice.</p>
13.1.4	Point (b)	<p>Can you please reword this last sentence for clarity. Suggest making this its own dot point.</p> <p><i>...distribution loss factor.</i></p> <p>(c) An unmetered <i>load NMI</i> cannot have Controlled Unmetered Devices and Uncontrolled Unmetered Devices.</p>

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.