

2 June 2022



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Consumer Data Right (CDR) MSATS Consultation

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on the *Consumer Data Right (CDR) MSATS Consultation*.

Energy Queensland provides responses to questions raised by AEMO in the attached Consultation Participant Response Template.

This submission is provided by Energy Queensland, on behalf of its related entities, specifically, distribution network service providers, Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network) and retailer Ergon Energy Queensland (Ergon Energy Retail).

Should AEMO require additional information or wish to discuss any aspect of this response, please contact Laura Males on 0429 954 346 or myself on 0438 021 254.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin".

Charmain Martin
Acting Manager Regulation

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Encl: *Energy Queensland comments to the Consultation Participant Response Template.*

CONSUMER DATA RIGHT (CDR) MSATS CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Ergon Energy Queensland, Energex, Ergon Energy Corporation

Submission Date: 2/6/2022

Table of Contents

| | |
|--|---|
| 1. Context | 4 |
| 2. Questions on proposed CDR changes | 4 |
| 3. Feedback on proposed minor amendments | 5 |

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Consumer Data Right 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 CDR changes

| Heading | Participant Comments |
|---|--|
| Does your organisation support the proposal contained in the Issues Paper? If not, please specify the areas where your organisation does not support AEMO’s assessment and specify information as to your rationale | Energy Queensland does not support the proposal relating to “Last Consumer Changed Date” as a single item change initiating a schema upgrade. When reviewing the AEMO NEM2025 Roadmap Implementation Plan, we consider there is an opportunity for greater engagement in various upcoming strategic and foundational initiatives. |
| 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? | It is Energy Queensland’s preference to delay implementation pending a full schema upgrade with the field “Last Consumer Changed Date” to be an optional field. A delay would enable market participants to align new initiatives to future planning. Furthermore, it would be our strong preference if there was no requirement to upgrade for participants not directly impacted, until the next multiparty upgrade. |
| What are the main challenges in adopting these proposed changes? How should these challenges be addressed? | Following recent reforms in the MSATS Standing Data Review, many changes and complex schema upgrades are currently being implemented for the November |

| Heading | Participant Comments |
|---|---|
| | 2022 release. It is therefore our preference to defer until a full schema upgrade is required to reduce financial and resourcing burdens on participants. |
| Do you have any further questions or comments in relation to the proposals? | <p>Energy Queensland seeks clarity as to whether AEMO intends to create a new FRMP SQL report for missing values in the 'Last Consumer Change Date' field.</p> <p>Further, we seek guidance on whether AEMO intends to provide all meter read histories, ie both historical and active.</p> |

3. Feedback on proposed minor amendments

| Document | Participant Comments |
|--|--|
| <p>1. For the enumerations lists in the procedures document, values such as 'Sample Tested' and 'Three-Phase Three-Limb', to be changed from mixed case to uppercase, to improve implementation and validation for both AEMO and Industry.</p> | Energy Queensland provides no comment. |
| <p>2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)</p> | Energy Queensland provides no comment. |
| <p>3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'</p> | Energy Queensland provides no comment. |
| <p>4. INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.</p> | Energy Queensland provides no comment. |

| Document | Participant Comments |
|--|---|
| <p>5. Alignment of character requirements across aseXML and the Standing Data for MSATs MSATS document by including a reference to the Australian Standards requirements, where relevant in the document applicable.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>6. For the correction of the GPSCoordinates format, implemented inas part of the r42 schema, to be reflected in the Standing Data for MSATs document: CATS_Meter_Register- Browser Cross Reference table.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>9. For GPS Coordinates of 0.00000 (5-7 decimal places), to align with the format specified in the NMI Standing Data Procedure, to be applied where no GPS coverage is available at the metering installation.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>10. For the inclusion of missing Transformer Valid Values to be added to the Standing Data for MSATS document and for all values to be formatted from smallest to largest.</p> | <p>Energy Queensland provides no comment.</p> |

| Document | Participant Comments |
|--|---|
| <p>11. The CATS Procedures to be updated to ensure that 'Meter Manufacturer' and 'Meter Model' are only required when the status code is 'C' (Current) for CR3050 and CR3051 transactions (CiP_061).</p> | <p>Energy Queensland provides no comment.</p> |
| <p>12. For the CATS Procedures to be updated to remove the CR6500/1 Change ROLR Completed Notification from the Change ROLR section to align with the WIGS Procedures</p> | <p>Energy Queensland provides no comment.</p> |
| <p>13. For the CATS Procedures to be updated for CRs (5001 & 5021) to include the NMI Classification of NCONUML as a classification code that have objections raised on it</p> | <p>Energy Queensland provides no comment.</p> |
| <p>14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.</p> | <p>Energy Queensland provides no comment.</p> |
| <p>15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.</p> | <p>Energy Queensland provides no comment.</p> |