# MSATS STANDING DATA REVIEW IMPLEMENTATION DATE

# PROPOSED MINOR AMENDMENT

# PARTICIPANT RESPONSE TEMPLATE

**Participant**: PLUS ES

**Submission Date**: 17/12/2021

## **Table of Contents**

1.	Context	3
2.	Questions on proposed changes	3
3.	Other Comments	4

#### 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed minor amendment process associated with the MSATS Standing Data Review implementation date.

The changes being proposed to the implementation date from 1 May 2022 to 7 November 2022 necessitate changes to AEMO's Retail Electricity Market Procedures.

## 2. Questions on proposed changes

Question	Participant Comments
Does your organisation agree with the proposed change to the implementation start date?	Whilst a further delay is not ideal and the approach not the most efficient, PLUS ES accepts the proposed change to the implementation start date with the following caveats:
	<ul> <li>Data which is currently available in MSATS for fields to be 'removed' is maintained post 7 Nov 2022 – since the availability in MSATS of the new fields and the removal of obsolete fields will go-live on the same date</li> <li>Ensuring a consistent flow of data availability/updating</li> </ul>
Does your organisation have an alternate proposal for implementation?	

#### 3. Other Comments

PLUS ES would like to raise the below concerns for AEMO's consideration.

Question	Participant Comments
Metrology Part A v73 section 14 (b)	Recent participant suggestions/comments with respect to the process of provisioning Shared fuse arrangement information, potentially remove the flexibility for process efficiencies and could lead to an increase in administrative effort and participant against.
	The procedures call for the FRMPs and MCs to notify the LNSP as this mirror and satisfies the NER rules. The obligations should not be interpreted as prescriptive processes to be followed.
	There appear to be participant interpretations that the FRMP/MC will notify the LNSP, to the exclusion of the MPB who is the actual party identifying the shared fuse arrangements on site. If this is interpreted literally it would cause duplication of the same detail and unnecessary administrative handling
	In the current world of contractual agreements the FRMP and the MC could possibly negotiate processes whereby their associated Service providers meet the obligations. For downstream efficiency, given the MPB (current or incoming) is the party who visits the site, some MC agreements could require the MPB to notify directly the LNSP instead of going through intermediaries such as the MC.
	PLUS ES proposes that the clauses be reviewed and amended accordingly to allow for flexible industry efficient processes
Metrology Part A v73 section 14 (c)	In addition to the above clause 14(c) calls for the MPB to notify the MC.

Question	Participant Comments
	There are participants who interpret the role to be current and confirmed in MSATS.
	For the bulk of shared fuse arrangements the party which will be identifying shared fuse arrangements will be the incoming MPB – given that in majority of cases, the site visit will consist of a meter churn from Type5/6 to contestable metering. The MPB will not be confirmed in MSATS until their meter has been installed on the site – an activity which the shared fuse arrangement will prevent.
	To deliver flexible and efficient industry processes, PLUS ES is proposing that the obligation/s which relate to the MPB and shared fuse arrangements are amended to clarify that the MPB participant can be current or incoming.