MSATS STANDING DATA REVIEW IMPLEMENTATION DATE

PROPOSED MINOR AMENDMENT

PARTICIPANT RESPONSE TEMPLATE

Participant: TasNetworks

Submission Date: 16 December 2021

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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.

Questions	on	proposed	changes
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Question	Participant Comments
Does your organisation agree with the proposed change to the implementation start date?	TasNetworks acknowledges AEMO's proposal to delay the implementation of MSDR changes to 7 Nov 2022 and notes AEMO's position communicated through respective forums of their inability to meet the 1 May 2022 date.
	TasNetworks makes the following observations as a consequence of this change:
	 Participants do not have the same ability that AEMO do in making a decision to defer the implementation. If a participant wasn't able to meet the timeframe they would have to consider contingency/workaround arrangements. TasNetworks, like many other participants, has already invested and committed time, costs and resources in planning for a 1 May 2022 implementation and will now have to incur additional investment of this type to now replan for the delay. There is potential for an increased risk by having to now undertake both MSDR and B2B changes at the same time in Nov 2022 Any commercial arrangements with software vendors will also have to be rescoped and negotiated.
	The overall project timeframe for participants is now extended.

Question	Participant Comments
	 This may impact participant's ability to undertake other crucial business related initiatives as additional cost and resource commitments are now required to meet the demands of the delay. TasNetworks requests that AEMO undertake a more detailed assessment during future consultation initiatives, prior to final determinations or rule decisions, to determine their ability to implement changes on the proposed date. It is critical that participants have surety of the proposed date prior to the final stage, as delays such as this cause substantial impost on all parties involved.
Does your organisation have an alternate proposal for implementation?	TasNetworks does not have an alternate proposal.