CONSUMER DATA RIGHT (CDR) CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant*:* TasNetworks

Submission Date*:* 31/05/2022

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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 Consumer Data Right consultation.

The changes being proposed are because of National Electricity Rules (**NER**) rule changes which have occurred requiring changes to Australian Energy Market Operator's (**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	The proposal to add a new field in the MSATS[1] CATS[2] Procedure has consequential impacts to all participants. TasNetworks anticipates that this would require a business to market (**B2M**) schema change. Participants would need to expend costs and resources to implement the new schema version into their systems or alternatively stay on n-1 version. TasNetworks requests confirmation that the new field would not be passed to participants who remain on the n-1 version. The majority of participants may choose to stay on the n-1 version, particularly to manage the phased implementation of CDR, and also due to the field being of little or no relevance to many. TasNetworks would like confirmation that AEMO's MSATS change

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[1] MSATS – Market Settlement and Transfer Solutions
[2] CATS – Consumer Administration and Transfer Solution

Heading	Participant Comments
	mechanisms would cope with having to transform large volumes of CATS messages, should this be the case. There has been recent instances where B2B changes have failed under load which caused impacts to participants. It can have significant ramifications for participants if market messages are unable to be processed. TasNetworks therefore questions whether adding a new field to MSATS for this specific use case is efficient, and whether requiring the Accredited Data Recipient to perform multiple requests to Data Holders in the instances where the Consumer may not have a full 24 months history with their current Retailer is a more efficient solution.
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?	The Accredited Data Recipient would be required to perform multiple requests to Data Holders in the instances where the Consumer may not have a full 24 months history with their current Retailer.
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Adding a new Standing Data field to MSATS has consequential impacts to initiators and recipients of the CR5054/5055 CATS message. Constraining the flow of data to the Accredited Data Recipient and Data Holders would address the impact on other participants.
Do you have any further questions or comments in relation to the proposals?	No.

3. Feedback on proposed minor amendments

Document	Participant Comments
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.	Accepted
2. For the Voltage Transformer Type enumerations, to remove descriptions where they exist in brackets e.g. 'CVT (Capacitive Voltage Transformer)	Accepted
3. Where Ratio enumerations exist, remove spaces between characters e.g. '3300 : 110' to '3300:110'	Accepted
4. INFORMATION' and 'STATISICAL' are to be truncated to 'STATIS' and 'INFORM' to fit within the 'USE' field 10 character max limit.	Accepted
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.	Accepted
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.	Accepted
7. For the truncated CurrentTransformerRatioAvailable and CurrentTransformerRatioConnected element names to be reflected in Table 4 CATS_Meter_Register – Browser Cross Reference.	Accepted

Document	Participant Comments
8. For the VoltageTransformerTest aseXML path to be corrected to ElectricityMeter/VoltageTransformerTest in table 4 CATS_Meter_Register – Browser Cross Reference.	Accepted
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.	Accepted
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.	Accepted
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).	Accepted
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	Accepted
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	Accepted
14. Update the WIGS procedure for CR5021 to allow the ENLR (LR) to object.	Accepted
15. Update the WIGS procedure to include BULK and XBOUNDARY to CR1500 to allow the MDP to send it to complete the CR.	Accepted