RETAIL ELECTRICITY MARKET PROCEDURES October 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet

Submission Date: 21st December, 2021

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the 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.	AusNet supports the proposals contained within this Issue Paper.
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?	
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Echoing the setiments captured during the ERCF, organisations have change fatigue. We have reviewed the same documents over and over again over the past two years. Consolidations of documents, especially procedures, should be performed outside of a regular change cycle as the impact of not picking up any errors within a consolidation, especially one of this size, can cause significant issues for an organisation and therefore requires additional time outside of reviewing new changes.

Heading	Participant Comments
	Furthermore, AusNet support the proposed two per year change cycle as proposed in the ERCF.
Do you have any further questions or comments in relation to the proposals described above?	
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 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)	AusNet supports CIP_045
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	AusNet supports CIP_050

Document	Participant Comments
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	AusNet supports CIP_042
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	AusNet supports CIP_048
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard and Connection Configuration Clarification)	AusNet supports CIP_049

4. Feedback on consolidations

Document	Version(s)	Clause	Participant Comments
CATS			
WIGS			
Metrology Part A			
Metrology Part B			
MSATS Procedures: MDM Procedures			
NEM RoLR Processes Part A and Part B			

Document	Version(s)	Clause	Participant Comments
(Glossary and Framework			
Standing Data document	5.11	9.1	Please see detailed feedback in relevant document section

5. MDFF NEM12 & NEM13

Section	Description	Participant Comments

6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments

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

Section	Description	Participant Comments

8. Standing Data document

Section	Description	Participant Comments
9.1	CATS_REGISTER_IDENTIFIER RegisterID	Although the Suffix section was amended from the First Stage to align with the approved ICF_029, the RegisterID section has been updated incorrectly and now de-couples the intent of ICF_029. The prescriptive requirements for the Register Identifier are resulting in the need to make unnecessary costly system changes and are not adding value to Market Participants. Hence, the original ICF_029 sought to remove the need to align the Register Identifier to the NMI Suffix, as such AusNet recommends reinstating the original definition. The RegisterID is an identifier used to identify records stored within the CATS_REGISTER_TABLE. A record must be created in the CATS_REGISTER_TABLE for each physical register within a meter. For Accumulation Meters, the RegisterID may reflect any unique identifier. E.g. '1', '01', '11', etc For Interval Meters, the RegisterID may match the content of the 'Suffix' within the CATS_REGISTER_IDENTIFIER table. E.g. 'E1', 'B1', 'Q1', 'K1', etc. The RegisterID is used to identify a data source that is obtained from the meter. A single meter may provide multiple data sources.

9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments

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

Section	Description	Participant Comments

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

Section	Description	Participant Comments

12. MSATS Procedures: (Meter Data Management) MDM Procedures

Section	Description	Participant Comments

13. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments

14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

9,	Section	Description	Participant Comments