RETAIL ELECTRICITY MARKET PROCEDURES OCTOBER 2021 CONSULTATION

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant**: Endeavour Energy*

***Submission Date**: 15/11/2021*

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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 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
What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	We note that this change will require a schema change along with major system and process changes. We also understand that for most market participants this change is mandatory in order to comply with the new proposed obligations. However AEMO is proposing that market trial starts 28/03/2022, which is four weeks prior to the 1 May 2022 go-live date. We believe that this can be challenging for the size of this change and can introduce risk of issues not identified or fixed prior to go live. In addition, we have a major internal project with strict timelines and resourcing requirements which will add to this challenge. We also note that to date we have not received written commitment from AEMO on when the final version of the new schema definition will be released. We suggest that AEMO commits to releasing the final version of the new schema definition by the end of November 2021 and considers providing at least 12 weeks for the market trial.

3. Feedback on proposed amendments

Document	Participant Comments

4. Feedback on consolidations

Document	Clause	Participant Comments
CATS	Table 4-D (NMI Classification Codes)	The changes introduced by ICF_031 and finalised in version 4.94 of the CATS Procedure is not captured in this draft. For completeness, we suggest that this change be included in version 5.1.
Metrology Part A	Version Release History table	The table still list version 7.3 and 7.31 with an effective date of 14 March 2022. However, AEMO published a final notice on 28/06/2021, after a consultation, to move the effective date to 1 May 2022. To avoid confusion, we suggest that this table be updated to show that version 7.3 and 7.31 has an effective date of 1 May 2022.
NMI Procedures (version 7.0)	Appendix E	Table 5 should be labelled as '1st October 2021 to 30th April 2022' Table 6 should be labelled as 'From 1 May 2022'

5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
3.3.1.b	Spaces, nulls and commas	Grammatical: suggest the full stop at the start of the sentence be removed
Appendix E	Reason Codes	Reason Code 0: The example provided is 'system issues which prevent delivery of market data'. We believe that this is a an unhelpful example because if delivery of market data is the issue then communicating the reason code would also be an issue. We suggest that a more realistic example be provided, such as: System issues which prevent the collection of metering data

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
	Version Release History	We note that an entry for version 4.6 is missing. For completeness we suggest that this be included in this table
Table 4	CATS_Meter_Register – Browser Cross Reference	GPS Coordinates – Latitude: We note that this value is likely to be a negative value, however the aseXML Data Type suggests that the minimum value is 0. Could you please confirm if a negative value can be provided with the proposed definition and if not then could this be updated so that a negative value can be provided?
Table 12	CATS_NMI_DATA – Field Definitions	ConnectionConfiguration field: The information in this field can change even when the NMI is active. For example, the customer may upgrade from single phase to three phase. Therefore, for completeness we suggest that the last sentence be replaced with: Information may be subject to change during the NMI lifecycle
Table 14	CATS_NMI_Data	The examples provided has both the ChildEmbeddedNetworkIdentifier and ParentEmbeddedNetworkIdentifier populated with the same value for the one

Section	Description	Participant Comments
		NMI. We understand that usually only one of these fields should only be populated, and if both were to be populated (because it is an embedded network within an embedded network) then they should have different values. If our understanding is correct then we suggest that the examples be updated to avoid confusion.
Table 17	CATS_NMI_Data_Stream - Example	We understand that table 17 is meant to provide examples of datastream records, however the examples provided are NMI Data records. We suggest that this be corrected to avoid confusion.
Table 18	CATS_REGISTER_IDENTIFIER – Field Definitions	NMI field: The NMI field has the LNSP as the 'Party to provide'. As this is the Register Identifier table we believe it is more correct to have the MPB nominated as the 'Party to provide'.
Table 18	CATS_REGISTER_IDENTIFIER – Field Definitions	ControlledLoad field: We note that this field has changed from a free text field to an enumerated field, with the allowable values defined in table 30. However, the description of this field still suggests a value for a particular scenario – not only is this redundant but it may also cause confusion because values are not exactly the same (one is all uppercase, while the other is mixed upper and lowercase). In addition, we understand that retailers are starting to offer some innovative tariffs that includes the retailer controlling the customer's load. To avoid

Section	Description	Participant Comments
		confusion with the original intent of this term, we suggest to clarify that this field is in reference to a controlled load that is managed by the network. We suggest that the description of this field be updated to: Indicates whether the energy recorded by this register is associated with a network Controlled Load regime. It must correspond to a valid in the Controlled Load Codes reference table listed in section 11.
Table 20	CATS_Register_Identifier - Example	TimeOfDay field: The allowable value for the Time of Day field for an interval meter is INTERVAL. For the avoidance of confusion we suggest that the example be updated to align with the intent of the document.
Table 20	CATS_Register_Identifier - Example	ControlledLoad field: The allowable value for the Time of Day field is NO, YES or EXT. For the avoidance of confusion we suggest that the example be updated to align with the intent of the document.
Table 30	Valid Controlled Load Codes	We understand that the intent is for the YES value to represent a controlled load register that is switched internally within a meter, while the EXT value represents a controlled load register that is switched externally from the meter. However, the current definition does not clearly make this distinct and it could be interpreted that YES could be used for both when the controlled load is

Section	Description	Participant Comments
		internally within a meter and switched externally from the meter. Such an interpretation would make the information unreliable and cause confusion. In addition, we understand that retailers are starting to offer some innovative tariffs that includes the retailer controlling the customer's load. To avoid confusion with the original intent of this term, we suggest to clarify that these values are in reference to a controlled load that is managed by the network. We suggest that the definition be updated to: NO: the register is not associated with a network controlled load scheme YES: the register is associated with a network controlled load scheme and the load is controlled internally within the meter EXT: the register is associated with a network controlled load scheme and the load is controlled externally from the meter
12	USE OF NMI SUFFIX TO POPULATE CATS_REGISTER_IDENTIFIER	We understand that datastreams for interval meters must move from net to register, and that from 01/10/2021 net datastreams are not allowed to be created and there is a transitional period for moving existing net datastreams to register datastreams. However this section still describes net datasteam as it is the preferred approach. For example it states:

Section	Description	Participant Comments
		'For settlements purposes this data must be 'NET' [Export from network, less import to network] and will be 'Nx' for an interval Datastream …' 'For settlements purposes, Interval Meter Datastreams will be the NET suffix (format Nx) …' For the avoidance of confusion, we suggest that this section be reviewed and updated to describe the preferred approach of having register datastream and maybe with a note that existing net datastreams may continue to exist until they are replaced with register datastreams.

9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
Table 4-D	NMI Classification Codes	Description for NREG: We understand that the intent of the updated description for NREG is to clarify that NREG should only be applicable for a NMI where the primary purpose of the connection point is for a generating unit only (that is, the connection point has no load, except for auxiliary loads for the generating unit). We note that AEMO has tried to convey this by inserting the word 'stand-alone', however this has caused confusion because this term is commonly used in the industry to mean a back up generator that is not connected to the network. We suggest that the word 'stand-alone' not be used in this description.

Section	Description	Participant Comments
		We support descriptions that are concise and unambiguous, and where possible described in simple plain English - we note that the second bullet point has been updated to become the opposite of this which we believe will be open to interpretation and ultimately lead to confusion. We therefore suggest that the description be updated to: Connection point where: • the embedded generating unit is classified by a Market Small Generation Aggregator as a market generating unit; or • the primary purpose is for a generating unit only and has no load (except for auxiliary loads for the generating unit)
9.1.4.e	LNSP Requirements (for CR2000 & CR2001)	The following data fields are bundled with the unstructured address table when they should be part of the structured address: GNAF PID, Section Number, DP Number and House Number To We suggest that this be corrected.
10.1.4.c	MPB Requirements (for CR3000 & CR3001)	We note that 'GPS Coordinates – Latitude' and 'GPS Coordinates – Longitude' are defined as 'Not Used for NMIS for Type 7 and NCONUML' in the Standing Data for MSATS. However, these fields are defined as mandatory for all CR3000 & CR3001 in the CATS Procedure.

Section	Description	Participant Comments
		We suggest that the CATS Procedure be updated to align with the intent as described in the Standing Data for MSATS.

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
Title Page	Effective Date	Suggest that the effective date be updated to 1 May 2022, as per the intention of this consultation

13. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments

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

Section	Description	Participant Comments
5	Glossary	Definition of Controlled Load: Th example provided in the definition are examples of network devices. For the avoidance of confusion we suggest the examples are located after mentioning network devices. In addition, we understand that retailers are starting to offer some innovative tariffs that includes the retailer controlling the customer's load. To avoid confusion with the original intent of this term, we suggest clarifying that this term is only in reference to a controlled load that is managed by the network. We suggest the definition of Controlled Load be reworded to: Load that is managed under a network controlled load scheme that can be controlled by the metering installation or a network device (e.g. frequency injection relay or time clock) and may be separately metered from the remaining load at a metering point. The majority of Controlled Loads are associated with off-peak hot water, pool pumps and air conditioning units.