

NTESMO Communications Guideline and MSATS Procedures V1.2 Draft Report and Determination

5 April 2024

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Notice of Second Stage Consultation

Date of Notice: 5 April 2024

This Notice of the Second Stage of rules Consultation (Notice) informs all relevant parties including;

- Northern Territory Electricity Market (NTEM) participants
- NT Utilities Commission
- NT Office of Sustainable Energy
- Australian Electricity Market Operator (AEMO)
- Persons who identify themselves to NT Electricity System Market Operator (NTESMO) as interested in the Communications Guideline (Consulted Persons) that NTESMO is conducting a consultation (Consultation) on the Communications Guideline and Market Settlements and Transfer Solutions (MSATS) procedures.

The Consultation is being conducted under clause S7A.1.3 of the Northern Territory National Electricity Rules (NT NER), in accordance with the Rules consultation requirements in NT NER clause 8.9.

Invitation to Make Submissions

NTESMO invites written submissions on this Draft Report and Determination (Draft Report).

Please identify any parts of your submission that you wish to remain confidential and explain why. NTESMO may still publish that information if it does not consider it to be confidential but will consult with you before doing so.

Consulted Persons should note that material identified as confidential may be given less weight in the decision-making process than material which is published.

Closing Date and Time

Submissions in response to this Notice should be sent by email to market.operator@powerwater.com.au, to reach NTESMO by 5.00pm (Darwin time) on 10 May 2024.

All submissions must be forwarded in electronic format (both pdf and Word). Please send any queries about this consultation to the same email address.

Submissions received after the closing date and time will not be valid, and NTESMO is not obliged to consider them. Any late submissions should explain the reason for lateness as well as the detriment to you if NTESMO does not consider your submission.

Publication

All submissions will be published on NTESMO's website, other than confidential content.

Executive Summary

The publication of this Draft Report and Determination (Draft Report) commences the second stage consultation by NTESMO on proposed changes to the Communications Guideline and associated MSATS procedures.

On 31 January 2024, NTESMO published the Notice of First Stage Consultation and the Issues Paper. The changes (Changes) which are proposed (Proposal) are to:

- Inclusions of Dispute Management process in the Communications Guideline attached to this consultation notice
- Revisions to the procedures as detailed below for managing information exchange transactions via the AEMO MSATS and B2B eHUB system
 - NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations
 - NTESMO Standing Data for MSATS
 - NTESMO Business to Business (B2B) Guide
 - NTESMO B2B Procedure Service Order Process
 - NTESMO B2B Procedure Customer and Site Details Notification
 - NTESMO B2B Procedure Meter Data Process

NTESMO received 3 submissions from Retailers, Local Network Service Providers (LNSPs), and generators. Overall, respondents indicated broad support of the proposed changes.

NTESMO has identified the following material issues, based on these submissions, as well as NTESMO's own analysis:

- Fees associated with dispute management under MSTATS
- Responsible parties for data accuracy

NTESMO has additionally made the following changes to the procedure documents:

- Removal of unused NMI classification codes from section 4.5 of the CATS procedures Minor amendments to correct formatting and typographical issues

NTESMO's draft determination is to update changes within the Communications Guideline and associated MSATS procedures in the form published with this Draft Report.

1. Stakeholder Consultation Process

NTESMO is consulting on the proposed changes to the Communications Guideline and associated MSATS procedures in accordance with the Rules Consultation Procedures in clause 8.9 of the NT NER, as required by clause S7A.1.3 of the NT NER.

NTESMO's indicative timeline for this consultation is outlined below. Future dates may be adjusted depending on the number and complexity of issues raised in submissions.

Deliverable	Indicative date
Issues Paper published	31 January 2024
Submissions due on Issues Paper	1 March 2024
Draft Report published	5 April 2024
Submissions due on Draft Report	10 May 2024
Final Report published	7 June 2024

The publication of this Draft Report marks the commencement of this second stage consultation.

2. Background

2.1 NT NER requirements

NTESMO is responsible for the establishment and maintenance of a Communications Guideline specified in S7A.1.3 of the NT NER.

The Communications Guideline authorised by NTESMO under Chapter 7A must be established and amended by NTESMO in accordance with the Rules consultation procedures.

2.2 Context for this consultation

NTESMO has developed the Changes to improve the functionality and efficiency of information exchange transactions between the NTEM participants. The Changes were developed by NTESMO.

In summary, the Changes are to:

- Adopt the version of the Communications Guideline attached to this Consultation Notice
- Adopt the administration amendments as detailed below:
 - NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations
 - NTESMO Standing Data for MSATS

- NTESMO Business to Business (B2B) Guide
- NTESMO B2B Procedure Service Order Process
- NTESMO B2B Procedure Customer and Site Details Notification
- NTESMO B2B Procedure Meter Data Process

The relevant effective date for all the documents is 1 September 2024.

2.3 First stage consultation

On 31 January 2024, NTESMO issued a Notice of First Stage Consultation and published an Issues Paper and initial draft amended procedure documents. This information is available on NTESMO's website.

The Issues Paper included a summary of the proposed changes.

In response, NTESMO received 3 submissions.

NTESMO has published copies of all written submissions (excluding any confidential information) on NTESMO's website.

3. Summary of Material Issues

The key material issues are as follows:

No.	Issue	Raised by
1.	Fees associated with dispute management under MSTATS	Retailer
2.	Responsible parties for data accuracy	Retailer

A detailed summary of the issues raised by Consulted Persons in submissions, together with NTESMO’s responses, is contained in **Appendix A**.

4. Discussion of Material Issues

4.1 Fees associated with dispute management under MSATS

4.1.1 Issue summary and submissions

The change proposal is to adopt the Dispute Management Process in the Communications Guideline and associated MSATS procedures for use in managing the information exchange processes between the Northern Territory Electricity Market (NTEM) participants.

This change:

- Adopts the Dispute Management Process in the Communications Guideline and associated procedures for use in the NTEM
- Proposes the use of the AEMO MSATS system for delivery for audit trail of information exchange between market participants
- Aligns the information exchange processes in the NTEM with the National Electricity Market

In response:

- Power and Water supported this change
- Jacana Energy raised concerns about costs associated with the audit trail being provided by NTESMO

4.1.2 NTESMO's assessment

NTESMO notes that the proposed changes reflected:

- The use of MSATS as the database of record for monitoring transactions and data at each site in the Territory Alignment with the responsibilities under the NT MSATS procedures

NTESMO acknowledges the issue raised concerning fees for managing the dispute management process. When the Communications Guideline becomes effective NTESMO does not plan on charging fees for the management of disputes.

NTESMO will review the dispute management process after twelve months of operations based on the volume of disputes and the time required to resolve any matters and if changes are required conduct a further consultation on this matter.

4.1.3 NTESMO's conclusion

NTESMO has maintained the proposed changes to the Communications Guideline effective 1 September 2024.

Questions:

1. Do participants agree with the proposal for NTESMO to review the dispute management process and fees after twelve months operations

4.2 Responsible parties for data accuracy

4.2.1 Issue summary and submissions

The change proposal is to clarify that the responsible party for data maintained in MSATS is the initiating party for each transaction.

The consultation process:

- Changed the Communications Guideline to include a dispute management process which states that each party is responsible for the data they maintain in MSATS
- The MSATS procedures state which party is responsible for maintaining each data field in MSATS

In response:

- Power and Water supported the proposed timeline
- Jacana Energy queried whether this requirement resided solely with retailers or with all market participants initiating transactions in MSATS.

4.2.2 NTESMO's assessment

NTESMO notes that the CATS Procedures section 2 details which party is responsible for updating each field in MSATS. This information is also detailed in each Change Request stating which party can raise the change request and which data fields are required to be populated.

The dispute management process in the Communications Guideline is designed to supplement these rules. In the case of a dispute NTESMO will contact the party who is responsible for maintaining the data field(s) that are under dispute. This covers both retailers, network and metering businesses. The party responsible for those fields is as defined in the CATS procedures.

Questions:

2. Do participants have a clear understanding from the CATS procedures of which data fields are the responsibility of each participant?

4.2.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the dispute management process in the Communications Guideline and MSATS procedures effective 1 September 2024.

5. Other Matters

NTESMO has additionally made the following changes to the procedure documents:

- Removed unused NMI Classification codes from table 4.5 in the CATS procedures
- Minor amendments to correct formatting and typographical issues

6. Draft Determination

NTESMO's draft determination is to amend the following procedure documents in the form published with this Draft Report, in accordance with Chapter 7A of the NT NER:

- NTESMO Communications Guideline v1.2 Draft Determination Change Marked
- NTESMO Communications Guideline v1.2 Draft Determination Clean
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.2 Draft Determination Change Marked
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.2 Draft Determination Clean
- NTESMO Standing Data for MSATS v1.2 Draft Determination Change Marked
- NTESMO Standing Data for MSATS v1.2 Draft Determination Clean
- NTESMO Business to Business (B2B) Guide v1.2 Draft Determination Change Marked
- NTESMO Business to Business (B2B) Guide v1.2 Draft Determination Clean
- NTESMO B2B Procedure Service Order Process v1.2 Draft Determination Change Marked
- NTESMO B2B Procedure Service Order Process v1.2 Draft Determination Clean
- NTESMO B2B Procedure Customer and Site Details Notification v1.2 Draft Determination Change Marked
- NTESMO B2B Procedure Customer and Site Details Notification v1.2 Draft Determination Clean
- NTESMO B2B Procedure Meter Data Process v1.2 Draft Determination Change Marked
- NTESMO B2B Procedure Meter Data Process v1.2 Draft Determination Clean

Appendix A: Summary of Submissions and NTESMO's Responses

Number	Question	Consulted Person	Participant Comments	NTESMO Response
1	Do you support having the MSTATS Dispute Management process included in the Communication Guideline?	Jacana Energy	<p>Jacana Energy understands that NTESMO is the governing authority for the procedural documentation and supports its role in the proposed MSATS Dispute Management Process.</p> <p>Jacana Energy reserves the right to engage directly with participants to resolve data integrity issues before escalating to NTESMO.</p> <p>Jacana Energy requests further clarification on whether NTESMO will propose fees associated with providing participants with an audit trail of transactions and if so, how the fee model would apply.</p>	NTESMO notes the response. At this stage no fees are planned for the dispute management process and this will be reviewed after 12 months of operation.
1	Do you support having the MSTATS Dispute Management process included in the Communication Guideline?	Power and Water	PWC supports this inclusion.	NTESMO notes the response from Power and Water.
2	Do you support the responsibility residing with the initiating party of each transaction for the accuracy of the data in MSATS?	Jacana Energy	Jacana Energy understands that the initiating party is the party who initiates the Service Orders, CDN, Life Support Notifications and Requests, One-way Notifications and Meter Data requests; hence the accountability of the data entered in MSATS for the above mentioned transactions should sit with the initiator. Jacana Energy does not agree with the question (above) as all participants are responsible for the accuracy of the data	NTESMO notes the response. For the transactions initiated by any party, be they a retailer, a network or a metering provider, all parties have the same responsibility for the accuracy of the

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			in MSATs, not just the initiating party. For example, the data accuracy of metering data will sit with network providers not retailers.	transactions they initiate in MSATs.
2	Do you support the responsibility residing with the initiating party of each transaction for the accuracy of the data in MSATs?	Power and Water	PWC supports this as being consistent with the MSATS procedures.	NTESMO notes the response from Power and Water.
3	Do you support the adoption on the new proposal in the CATS procedure?	Jacana Energy	<p>Broadly speaking, Jacana Energy supports the revisions to the CATS and NMI Standing Data procedures with exception to the following additions which are yet to be assessed and discussed with</p> <p>PWC:</p> <ul style="list-style-type: none"> • DIRS Connection point • TIRS Connection point • WHOLESAL Transmission network <p>Jacana Energy will require time to discuss the amendments with PWC and the billing software provider to determine impact to the project effort and costs.</p> <p>Jacana Energy can only fully endorse both the system and the procedures after the industry testing phase has been completed. At this point in the process, the system</p>	NTESMO notes the response from Jacana Energy.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			testing is still at an early stage and the full impact is unknown.	
3	Do you support the adoption on the new proposal in the CATS procedure?	Power and Water	PWC supports their inclusion.	NTESMO notes the response from Power and Water.
4	Does the change from two business days to one business days align with the Northern Territory regulatory requirements?	Jacana Energy	Jacana Energy supports the change from two business days to one business day which aligns to the NT regulatory requirements	NTESMO notes the response from Jacana Energy.
4	Does the change from two business days to one business days align with the Northern Territory regulatory requirements?	Power and Water	PWC agrees this aligns the two instruments	NTESMO notes the response from Power and Water.
5	Do you support the proposed inclusion of the protection period for De-energisations?	Jacana Energy	Jacana Energy supports the proposed inclusion of the protection period for De-energisations.	NTESMO notes the response from Jacana Energy.
5	Do you support the proposed inclusion of the protection period for De-energisations?	Power and Water	PWC supports this inclusion.	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
6	Are there other options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	Jacana Energy	Jacana Energy is of the view that data integrity and alignment is critical to the success of this project and therefore there is no other option available other than to adopt the proposed changes. This will provide the confidence for all participants during the transition phase and mitigate any customer impact.	NTESMO notes the response from Jacana Energy.
6	Are there other options to accommodate the proposed change that better achieve the stated objectives? What are the related pros and cons? How would they be implemented?	Power and Water	PWC does not consider any alternatives	NTESMO notes the response from Power and Water.
7	What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Jacana Energy	Jacana Energy understands that aligning data transformation rules requires significant engagement and consultation between all participants and this must be completed prior to Industry Testing. With Industry Testing due to commence on the 17 April 2024, it is imperative that data integrity is prioritised with regards to resource effort and timing amongst all participants.	NTESMO notes the response from Jacana Energy.
7	What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Power and Water	PWC has no major challenges to implementing these changes	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
8	What are the costs and/or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	Jacana Energy	As outlined in question 6, Jacana Energy understands the benefits of adopting the proposed changes and will continue to actively engage with key participants to achieve data alignment and integrity. If the proposed changes are not fully understood and implemented in time for industry testing, Jacana Energy could execute test cases that will potentially fail due to mismatch or misaligned data. This will extend or delay the industry testing phase, resulting in additional resource effort and costs	NTESMO notes the response from Jacana Energy.
8	What are the costs and/or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts.	Power and Water	PWC has no major challenges to implementing these changes	NTESMO notes the response from Power and Water.
9	Do you have any other suggestions, comments or questions regarding this consultation?	Jacana Energy	Jacana Energy is of the view that, whilst it appears that there is enough information provided in the specifications, this can only be verified through the industry testing process. Jacana Energy requests that the Procedure can be amended following industry testing with any required changes prior to finalisation of the consultation process.	NTESMO notes the response from Jacana Energy.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			Jacana Energy recommends NTESMO include a concise summary of key changes be included in all future amendments to enable participants within the confirmed timeframe.	
9	Do you have any other suggestions, comments or questions regarding this consultation?	Power and Water	In the CATS procedures section 4.5 the NMI Classification codes DIRS and TIRS should be marked as 'Not used in the NT procedures' as these codes are not applicable in the Territory.	NTESMO notes the response from Power and Water.
9	Do you have any other suggestions, comments or questions regarding this consultation?	ENI	Eni has reviewed the Communications Guideline together with the associated procedures and guides does not have any comments, therefore will not be providing a submission.	NTESMO notes the response from ENI.

Contact

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