

NTESMO Communications guideline

Procedure consultation first stage participant response template

Participant: Jacana Energy

Submission date: 8 August 2022

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Communications Guideline consultation.

The consultation is being conducted for the initial adoption of the NT Communications Guideline and use of the Australian Electricity Market Operator (AEMO) Market Settlements and Transactions Solutions (MSATS) system for information exchange processes.

Adoption of communications guideline

1. Do you support having the same information exchange processes for all NT electricity sites?

Jacana Energy generally supports having the same information exchange processes for all sites in the NT, provided that the sites with unique criteria can be readily identified to enable the relevant unique billing processes to be applied.

Sites with 'unique' criteria include sites with prepaid meters, unmetered sites, sites with PV meters and sites that are in a manually managed location and consequently the facilitation / connection processes are different. Jacana Energy requests further clarification how these 'unique criteria' sites will be approached under the Communications Guideline and recommends that a protocol be defined (ideally included in the Communication Guideline) that clearly sets out the approach for these particular sites.

2. Do you support the adoption of the 'communication guideline' as included in this change proposal?

Jacana Energy encourages the adoption of information exchange processes particularly those that will improve the reliability and accessibility of standing data in the Northern Territory. Jacana Energy does not support retailers taking on additional responsibilities through the introduction of the new Procedures.

The proposed Communication Guideline and consultation process is very high level and Jacana Energy, as per the consultation process, requests a meeting with NTESMO to work through in greater detail the implications and change management required in relation to the existing and proposed business to business interactions.

The full impact of the adoption of the Communication Guideline cannot be determined from the documentation alone and will only be evident from the industry testing process which has not been yet been defined or communicated.

Jacana Energy recommends that the industry testing forms part of the formal acceptance of the Communication Guideline process, whereby any changes identified through the testing phase can be included in the Procedures.

3. Do you support the stand-alone structuring of these documents and consulting under the Rules Consultation Procedure on future changes to these documents?

Jacana Energy requests further information regarding what the consultation processes will entail and what ongoing organisational resources and input will be required for Jacana Energy to participate in these consultation procedures.

Further clarification is required to understand: o the requirements for implementing the outcomes from these consultations (particularly in relation to system updates and procedural changes); o the frequency of consultation; and o the timing for implementation.

Use of AEMO MSATS system in the NT

4. Do you support the use of the AEMO MSATS system and associated procedures for the delivery of information exchange processes in the Northern Territory?

Broadly speaking, Jacana Energy supports the use of the MSATS system and its associated procedures. However, it 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 implications are theoretical and the full impact unknown.

The B2B Guide includes an NT specific process map for establishing new connections, this is a newly defined process and requires further consultation and clarification regarding the processes and responsibilities between retailers and the DNSP.

Jacana Energy requests a meeting with NTESMO to understand the full implications of this process and manage any changes to existing B2B Processes.

5. Do you understand the distinction in responsibilities between NTESMO and AEMO?

Jacana Energy understands that NTESMO is the governing authority for the procedural documentation and that AEMO provides the MSATS system.

Jacana Energy requests further clarification and definition on the roles and responsibilities between the two entities. For example, the responsibility for data inconsistencies and outages and delays in chain of supply e.g. life support and customer transfers, whether these are addressed through a Business Continuity and Disaster Recovery plans, who provides these and further information regarding service levels and indemnities.

Use of MSATS for NMI Standing Data and Customer Transfers

6. Do you support the proposed new mechanism for the retail transfer of a customer?

Jacana Energy supports the new mechanism for customer transfers between retailers to introduce process efficiencies and improvements in alignment of customer data. Jacana Energy notes that there are misalignments with the Electricity Retail Supply Code and the proposed Procedures.

For example, the Code states that a Customer Transfer Request form must be completed. Is the intention that the Code be amended so that the Customer Transfer Request form is no longer required or used or will both processes still be applicable?

Jacana Energy recommends that inconsistencies between the Electricity Retail Supply Code and the proposed Procedures be addressed through this Consultation process and changes applied to the code (where applicable) occur in conjunction to ensure all participants are clear on their obligations.

7. Do you support the adoption of NEM12 and NEM13 meter data file formats for the delivery of meter data under this Proposal?

Jacana Energy supports the adoption and continued use of NEM12 and NEM13 meter data file formats.

NT B2B Procedure Service Order Process

8. Do you support the list of available business to business transactions?

Jacana Energy does not support retailers taking on additional responsibilities through the change of the structure.

While Jacana Energy supports the list of service orders in theory, the change to the structure of service orders and service order types will require system and business process changes. The full impact requires further investigation and will be only fully understood through the industry testing stages.

Jacana Energy requests a meeting with NTESMO to gain further clarity for change management of the various business to business transactions - particularly the new service order types.

NT B2B Procedure Customer and Site Details Notification

9. Does the life support process and data contained within this Procedure satisfy your organisations requirements for life support? If not please explain any discrepancy.

Jacana Energy requests further clarification on the timeliness of meter data provisioning. While the delivery of the data will be in a consistent format it is still dependent on the gathering of the meter data by Power and Water Corporation.

Jacana Energy requests the definition and obligation of service levels for the provisioning of meter data in line with the implementation of the new delivery mechanisms.

In addition, Jacana Energy notes that there are inconsistencies between the proposed mechanisms for the delivery and querying of meter data in the Procedures and the life support obligations set out in the Electricity Retail Supply Code.

NT B2B Procedure Meter Data Process

10. Does the proposed mechanisms for the delivery and querying of meter data support the operational

Jacana Energy requests further clarification on the timeliness of meter data provisioning. While the delivery of the data will be in a consistent format it is still dependent on the gathering of the meter data by Power and Water Corporation.

Jacana Energy requests the definition and obligation of service levels for the provisioning of meter data in line with the implementation of the new delivery mechanisms. In addition, Jacana Energy notes that there are inconsistencies between the proposed mechanisms for

the delivery and querying of meter data in the Procedures and the life support obligations set out in the Electricity Retail Supply Code.

NT B2B Procedure Technical Delivery Specification

11. Are the detailed technical specifications sufficient for participants to design and commission the information systems necessary for it to engage with the proposed information exchange processes?

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 is able to be amended following industry testing with any required changes prior to finalisation of the consultation process.

Use of AEMO Guides and schema documents

12. Do you support the proposed NTESMO model of utilising the AEMO guides and technical documents where possible rather than reproducing a NT version of these documents?

Jacana Energy supports, in principle, the use of the AEMO guides and technical documents as they relate to the MSATS system technical instructions in generic terms of system usage.

Other issues related to consultation subject matter

13. 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?

The only other option that is evident, would be to create bespoke business to business processes for the NTEM. Jacana Energy finds that the current consultation process does not encourage enough information exchange between all parties in order to address issues and risks identified through the implementation of the new procedures.

Jacana Energy is concerned that unless engagement between market participants is undertaken on a regular and more formal basis that there may be further delays to implementation.

To mitigate this risk and to ensure that all parties fully understand the magnitude of the changes, Jacana Energy recommends the establishment of: o a Joint Steering Committee involving senior management for all impacted market participants to facilitate the ongoing review of procedures and comparison with the related regulatory obligations and to assess and mitigate risks raised prior to system implementation; and o a Technical Working Group to report into the Joint Steering Committee represented by all impacted market participants to assist in the coordination of the industry testing phase and to raise and address risks and issues found during the implementation of the project.

14. What are the main challenges in adopting these proposed changes? How should these challenges be addressed?

Assessment of full impact of changes Currently this project implementation is run individually by each of the participants. It would be beneficial for all parties to approach this challenging task much earlier than the commencement of the industry testing phase to

ensure consistency and continuity. Visibility of the proposed data transfer model (specifications) for participants to include in the technical scoping and design will be critical to the project success.

Agreement to the proposed procedures is theoretical, Jacana Energy does not have access to MSATS, and the accreditation process has not been defined. MSATS training would be helpful to understand the documentation in a practical sense as it is fairly technical.

Change management required Consideration should also be given to the impact of changes to the current business processes and future amendments to the procedures.

Changes should be considered and identified as soon as possible, so that all parties can adopt and implement specific NTEM procedures in conjunction.

Cost challenges associated with implementation It is difficult for Jacana Energy to estimate the full cost implications of adopting these proposed changes at this stage. However Jacana Energy is anticipating that the costs will be substantial and it is not clear whether Jacana Energy will receive a return on such investment.

It is unclear what costs will be incurred by participants beyond 2024. Inconsistencies with other regulatory obligations There appear to be a number of inconsistencies between the proposed changes and other regulatory instruments that will need to be addressed. In particular, misalignments with the Electricity Retail Supply Code will need to be worked through. Jacana Energy will be unable to comply with two separate process unless the process for updating and amending the Electricity Supply Code is run in conjunction with the consultation process (so that all amendments are implemented at the same time to avoid any inconsistencies between obligations).

Ongoing consultation process Further clarification is required regarding the ongoing consultation process and the impacts over the long term. For example, how will new versions of the procedures be managed and what is the timeframe for implementing future versions?

15. What are the costs and/or benefits if the proposed changes were not made? Consider the perspectives of process, training, system and customer impacts

Not implementing the proposed changes will certainly save time in resources, system upgrades, training, updating internal procedures etc.

High cost will be incurred for the implementation of this project to meet the ambitious timeline, and to complete sufficient testing and end user training However, there are long standing issues with the current processes that are also incurring costs need to be addressed by the implementation of this system.

Jacana Energy believes that given the nature of the NTEM, a significant number of bespoke changes to the AEMO procedures will be required for the purposes of adoption in the NTEM. When the AEMO procedures are adopted many will end up being significantly amended and adjusted for application in the NTEM. In other words, they will end up being bespoke NTEM

procedures, which may mean that any benefits associated with efficiencies gained through streamlined and standardised processes may be eroded.

16. These changes are proposed to be effective from 1 July 2023. Does that provide each participant with sufficient time to develop the required systems and process to transact according to the proposed new rules?

Jacana Energy does not believe this date provides sufficient time to implement system changes, conduct internal and industry testing, identify and address material risks, change manage the revised business processes and train staff accordingly. Noting the consultation process on the documentation has taken over 1 year, on balance the remainder of the project including implementation will almost certainly require additional time to the proposed project deadlines.

Jacana Energy has customised processes and systems according to the current NT regulatory requirements including integrations with multiple government departments and agencies. Jacana Energy will need to assess and revise those customisations to suit the proposed Procedures at significant cost.

To mitigate material risks associated with go-live, Jacana Energy recommends the implementation of a clear set of go/no-go criteria for all participants, managed through the proposed Technical Working Group and Joint Steering Committee, as a means to confirm acceptance from all participants at the industry testing phase and make any final changes to the consultation documents.

17. Do you have any other suggestions, comments or questions regarding this consultation?

Jacana Energy suggests that this consultation phase be only closed out following acceptance of the industry testing. Reviewing technical process documentation does not provide sufficient understanding of the full impact of the revised processes without having tested the system that is to be implemented.

Please use this NTESMO participant response template and send any queries in respect of the consultation to market.operator@powerwater.com.au