

Communications Guideline Procedure consultation

Participant response template

Participant: JACANA ENERGY

Submission date: MARCH 11, 2024

Contents

1	Context	2
2	Participant comments	2
	Dispute management process in the Communication Guideline	2
	Revisions to the CATS and NMI Standing Data procedures	3
	Administrative amendments to documents	3
	Other issues related to consultation subject matter	3

1 Context

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

The consultation is being conducted for the amendments to the NT Communications Guideline and associated procedures.

2 Participant comments

Dispute management process in the Communication Guideline

1. **Do you support having the MSATS Dispute Management process included in the Communication Guideline?**

Jacana Energy understands that NTESMO is the governing authority for the procedural documentation and supports its role in the proposed MSATS Dispute Management Process.

Jacana Energy reserves the right to engage directly with participants to resolve data integrity issues before escalating to NTESMO.

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.

2. **Do you support the responsibility residing with the initiating party of each transaction for the accuracy of the data in MSATS?**

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 abovementioned 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 in MSATs, not just the initiating party. For example, the data accuracy of metering data will sit with network providers not retailers.

Revisions to the CATS and NMI Standing Data procedures.

3. Do you support the adoption on the new proposal in the CATS procedure?

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 PWC:

- DIRS Connection point
- TIRS Connection point
- WHOLESAL Transmission network

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.

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 testing is still at an early stage and the full impact is unknown.

Administrative amendments to documents.

4. Does the change from two business days to one business day align with the Northern Territory regulatory requirements?

Jacana Energy supports the change from two business days to one business day which aligns to the NT regulatory requirements.

5. Do you support the proposed inclusion of the protection period for De-energisations?

Jacana Energy supports the proposed inclusion of the protection period for De-energisations.

Other issues related to consultation subject matter

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 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.

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

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.

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.

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.

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

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.

Jacana Energy recommends NTESMO include a concise summary of key changes be included in all future amendments to enable participants within the confirmed timeframe.

Contact

Please use this NTESMO Participant Response template and send any queries in respect of the Consultation to:

market.operator@powerwater.com.au.

ntesmo.com.au

NTESMO