
NTESMO
Communications Guideline
and MSATS Procedures v1.0

12 September 2022

Draft Report and Determination

Proposed Changes

Initial adoption of the Communications Guideline and Market Settlements and Transfer Solution Procedures in the Northern Territory Electricity Market

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Notice of second stage consultation

Date of Notice: 12 September 2022

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 11 October 2022.

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 adoption of the Communications Guideline and associated MSATS procedures.

On 30 June 2022, NTESMO published the Notice of First Stage Consultation and the Issues Paper. The changes (Changes) which are proposed (Proposal) are to:

- Adopt the version of the Communications Guideline attached to this consultation notice
- Adopt the use of the AEMO MSATS system for Information Exchange transactions within the NTEM
- Adopt the procedures as detailed below for managing information exchange transactions via the AEMO MSATS system
 - NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations
 - NTESMO Standing Data for MSATS
 - NTESMO Meter Data File Format Specification NEM12 and NEM13
 - 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 B2B Procedure One Way Notification Process
 - NTESMO NT B2B Procedure Technical Delivery Specification

NTESMO received 3 submissions from Retailers, Local Network Service Providers (LNSPs), and generators. NTESMO also held one meeting with Jacana Energy on 16 August 2022. Overall, respondents indicated broad support of the proposed changes.

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

- Inconsistencies with the Electricity Retail Supply Code
- Timing of completion of consultation
- Retailers taking on additional responsibilities
- Life support processes

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

- Removed clauses related Notified Party from all applicable procedures as not applicable in the NT
- Corrected identification of prepaid meters in Standing Data for MSATS
- Minor amendments to correct formatting and typographical issues

NTESMO's draft determination is to adopt 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 adoption of 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	30 June 2022
Submissions due on Issues Paper	8 August 2022
Draft Report published	12 September 2022
Submissions due on Draft Report	11 October 2022
Final Report published	18 November 2022

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 use of the AEMO MSATS system for information exchange transactions within the NTEM
- Adopt the procedures as detailed below for managing information exchange transactions via the AEMO MSATS system
 - NTESMO MSATS Procedure – CATS Procedure Principles and Obligations

- NTESMO Standing Data for MSATS
- NTESMO Meter Data File Format Specification NEM12 and NEM13
- NTESMO B2B Guide
- NTESMO B2B Procedure Service Order Process
- NTESMO B2B Procedure Customer and Site Details Notification
- NTESMO B2B Procedure Meter Data Process
- NTESMO B2B Procedure One Way Notification Process
- NTESMO B2B Procedure Technical Delivery Specification

The relevant effective date for all the documents is 2 October 2023.

2.3 First stage consultation

On 30 June 2022, 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 also held one meeting with Jacana Energy on 16 August 2022.

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.	Inconsistencies with the Electricity Retail Supply Code	Retailer
2.	Timing of completion of consultation	Retailer
3.	Retailers taking on additional responsibilities	Retailer
4.	Life support processes	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 Inconsistencies with the Electricity Retail Supply Code

4.1.1 Issue summary and submissions

The change proposal is to adopt the Communications Guideline and associated MSATS procedures for use in managing the information exchange processes between the Northern Territory Electricity Market (NTEM) participants. This will replace the existing information exchange processes published under the NT Electricity Retail Supply Code (ERSC).

This change:

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

In response:

- Power and Water and EDL Energy supported this change
- Jacana Energy raised concerns about having two regulatory instruments (Communications Guideline and Electricity Retail Supply Code) requiring different information exchange processes and having to manage these obligations to ensure that they were compliant with each instrument

4.1.2 NTESMO's assessment

NTESMO notes that the proposed changes reflected:

- Consultation with the Utilities Commission and market participants to construct an efficient information exchange process
- The Utilities Commission evaluating amendments to the Electricity Retail Supply Code to align the obligations with the Communications Guideline

NTESMO acknowledges that the current review of the Electricity Retail Supply Code is being undertaken concurrently with this consultation and there is no certainty over the timing or outcomes of that review and whether the applicable clauses will be amended by the Utilities Commission. NTESMO will continue liaising with the Utilities Commission concerning the alignment of the two regulatory instruments.

The proposed commencement date for the Communications Guideline is 2 October 2023 providing 13 months for the alignment of the two information exchange processes.

The risk mitigation strategies being evaluated by NTESMO for the scenario where the current information exchange rules in the Electricity Retail Supply Code are not amended include:

- Working with the Local Network Service Provider to draft a new Customer Transfer Request Form, under clause 8.2.2 of the ERSC, which instructs retailers to use the Communications Guideline rules to transfer the electricity retailer of a customer

- Working with the Local Network Service Provider to draft a new Service Order procedure, under clause 7.2.3 of the ERSC, which instructs participants to use the Communications Guideline rules for future service order transactions and submit that to the Utilities Commission for approval under clause 7.2.4
- Participants applying for letters of 'No Action' with the Utilities Commission for non-compliance with the provisions in the ERSC

4.1.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the Communications Guideline and MSATS procedures effective 2 October 2023.

Questions:

1. Do the proposed measures for the potential conflict in arrangements under the Communications Guideline and the Electricity Retail Supply Code provide participants with an effective mechanism for managing this risk?
2. Are there any other potential conflicts identified by participants between the Communications Guideline rules and the Electricity Retail Supply Code?
3. Do participants have any other proposals for managing the potential conflict in requirements between the two regulatory documents?

4.2 Timing of Completion of Consultation Process

4.2.1 Issue summary and submissions

The change proposal is to adopt the Communications Guideline and associated MSATS procedures for use in managing the information exchange processes between the Northern Territory Electricity Market (NTEM) participants effective 2 October 2023 with the current consultation on the Communications Guideline being finalised on 4 November 2022. Queries were raised over the timing of the Consultation process.

The consultation process:

- Must be in compliance with Clause 8.9 of the NT National Electricity Rules
- Clause 8.9 of the NT NER has timing requirements for each stage of the process which must be adhered to by NTESMO

In response:

- Power and Water supported the proposed timeline
- Jacana Energy stated that the consultation process should not be finalised until after the completion of industry testing to allow time for identification of any changes required to the procedures to be incorporated into the final published Communications Guideline

4.2.2 NTESMO's assessment

NTESMO notes that industry testing between participants could highlight changes to the Communications Guideline and associated procedures. Any participant can request future changes to the Communications Guideline and Procedures.

The Communication's Guideline and associated procedures are not static documents and will change to meet evolving market requirements. All changes will be consulted on under clause 8.9 of the NT NER.

NTESMO is planning on initiating the next consultation on the Communications Guideline in June 2023 to incorporate changes implemented to the comparable National Electricity Market procedures. This provides an opportunity to incorporate any changes highlighted through the NT industry testing process.

4.2.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the Communications Guideline and MSATS procedures effective 2 October 2023 and finalising the current consultation on 4 November 2022.

4.3 Retailers taking on Additional Responsibilities

4.3.1 Issue summary and submissions

The change proposal alters the information exchange processes for all market participants and the transactions required by participants to request work from another party or to transfer the retailer of a customer site. The new information exchange processes are designed to replace the existing process in operation on the NTEM.

In response:

- Jacana Energy queries if the new information exchange processes were increasing a retailer's responsibilities compared to the current information exchange processes

4.3.2 NTESMO's assessment

Under the Electricity Retail Supply Code a retailer is required to submit a customer transfer request form to commence being the retailer for a site. Under the Communications Guideline the retailer is required to raise a MSATS Change Request to nominate themselves as the retailer for a site. While the mechanism for customer transfers is changing, the responsibility remains with the retailer to initiate the customer transfer.

The Communications Guideline does have additional Business to Business transactions that are not available under the current NT Service Order Processes. These transactions are not mandatory and it is for each participant to choose which business to business transactions to use in any given circumstance.

Both the Communications Guideline and the current Service Order procedures place the obligation on the party requiring the service to initiate the transaction. A participant can choose to utilise the full suite of available business to business transactions or use a subset.

4.3.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the Communications Guideline and MSATS procedures effective 2 October 2023.

Questions:

4. Can participants provide details on where there are additional responsibilities being placed on the retailers through the Communications Guideline?
5. If there is a specific transaction or process which is leading to uncertainty for a participant can they provide the details that require clarification.

4.4 Life Support Processes

4.4.1 Issue summary and submissions

The Communications Guideline and associated procedures contains new processes for the management of customers with life support. This process was subject to detailed analysis and workshops prior to the initial publication of the Communications Guideline. While the Communications Guideline details the information exchange processes for participants who have customers with life support it does not change the obligations of participants under the Electricity Retail Supply Code to those customers with life support requirements.

In response:

- Power and Water supported this change
- Jacana Energy raised concerns focused on:
 - Meeting life support obligations under two separate instruments
 - Inconsistencies between the two regulatory instruments concerning customer consent and timing of communication of data
 - Management of the transition between life support information exchange processes to ensure no impacts on customers with life support

4.4.2 NTESMO's assessment

NTESMO agrees that clause 4.1.c) of the NTESMO B2B Customer Details and Site Notification process places an additional obligation on retailers which is not in the Electricity Retail Supply Code. This clause has now been removed.

NTESMO notes that under the Electricity Retail Supply Code clause 10.3A.1.c) and 10.3C.1.c) a retailer or local network service provider must notify the other party within one business day of being advised that a customer has life support requirements. Under the proposed NTESMO B2B Customer Details and Site Notification procedure clause 4.5.e) requires the Life Support Notification to be provided within one business day of the participant updating their records for a site. There is no inconsistency between the two regulatory requirements.

NTESMO acknowledges the importance of the transition period between the information exchange processes and the necessity to ensure that this has no impacts on the records of customers with life support. While this is not part of the consultation process NTESMO will work with the retailers and local network service provider to develop a transition plan and process for testing the records to ensure that the change in information exchange process does not impact on the customers with life support.

4.4.3 NTESMO's conclusion

NTESMO has maintained the proposed introduction of the Communications Guideline and MSATS procedures effective 2 October 2023.

Questions:

6. Are there any other inconsistencies not already identified between the life support obligations under the Electricity Retail Supply Code and the proposed B2B Customer Details and Site Notification procedure?

5. Other Matters

A number of respondents have proposed additional minor amendments to the various procedure documents within the Communications Guideline Package.

NTESMO has:

- Amended the procedure documents, as shown in the track changed versions published with this draft determination where the proposed amendments provide clarity or consistency, without changing the meaning of the relevant obligation; or
- Not amended the procedure documents, where the proposed amendment is outside of the scope of this consultation

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

- Removed clauses related to Notified Party from all applicable procedures as not applicable in the NT
- Corrected identification of prepaid meters in Standing Data for MSATS
- Minor amendments to correct formatting and typographical issues

The changes made are detailed below:

NTESMO B2B guide

Removed all references to notified party transactions and one way notifications

Section 6.1.3 Table 2, removed 'for type 5/6 meters'

NTESMO B2B Customer and Site Details Notification

Clause 4.1(c) amended, covered in the draft report

NTESMO B2B One Way Notification procedure marked not used

NTESMO B2B Service Order Process

Removed reference to Notified Party

NTESMO B2B Technical Specification

Section 8 notified party not used in NT

NTESMO Standing data for MSATS

Table 18, Description for NetworkAdditionalInformation field is now just Free text field

NTESMO MSATS CATS Procedures

Section 4.2 restored

MeterUse field now includes 'PREPAID' and removed from NetworkAdditionalInformation field

NTESMO proposes that the amended procedure documents will come into effect on 2 October 2023.

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 v1.0 Draft Determination Change Marked
- NTESMO Communications Guideline v1.0 Draft Determination Clean
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.0 Draft Determination Change Marked
- NTESMO MSATS Procedure – Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations v1.0 Draft Determination Clean
- NTESMO Standing Data for MSATS v1.0 Draft Determination Change Marked
- NTESMO Standing Data for MSATS v1.0 Draft Determination Clean
- NTESMO Meter Data File Format Specification NEM12 and NEM13 v1.0 Draft Determination Change Marked
- NTESMO Meter Data File Format Specification NEM12 and NEM13 v1.0 Draft Determination Clean
- NTESMO Business to Business (B2B) Guide v1.0 Draft Determination Change Marked
- NTESMO Business to Business (B2B) Guide v1.0 Draft Determination Clean
- NTESMO B2B Procedure Service Order Process v1.0 Draft Determination Change Marked
- NTESMO B2B Procedure Service Order Process v1.0 Draft Determination Clean
- NTESMO B2B Procedure Customer and Site Details Notification v1.0 Draft Determination Change Marked
- NTESMO B2B Procedure Customer and Site Details Notification v1.0 Draft Determination Clean
- NTESMO B2B Procedure Meter Data Process v1.0 Draft Determination Change Marked
- NTESMO B2B Procedure Meter Data Process v1.0 Draft Determination Clean
- NTESMO B2B Procedure One Way Notification Process v1.0 Draft Determination Change Marked
- NTESMO B2B Procedure One Way Notification Process v1.0 Draft Determination Clean
- NTESMO NT B2B Procedure Technical Delivery Specification v1.0 Draft Determination Change Marked
- NTESMO NT B2B Procedure Technical Delivery Specification v1.0 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 same information exchange processes for all NT electricity sites?	Jacana Energy	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.	<p>The identification of unique site criteria is supported through the available MSATS data fields as follows:</p> <ul style="list-style-type: none"> • Prepaid meters will be in the 'Meter Use' field attached to each meter in MSATS • Unmetered sites will be identified in the 'Metering Installation Type Code' field as UMCP Type 7 meters • PV meters (on site generation) will be shown by having an active B channel on a meter attached to a NMI in MSATS • Manually managed location will be provided as the NMI location is provided in MSATS for every NMI

Number	Question	Consulted Person	Participant Comments	NTESMO Response
				No further information is required in the Communications Guideline as the available information is in the procedure documents to readily identify these sites.
1	Do you support having the same information exchange processes for all NT electricity sites?	Power and Water	Yes. Streamlining retailer interaction will promote efficient service delivery for PWC as PWC will have one process for managing all retailer requests across the Territory.	NTESMO notes the response from Power and Water.
2	Do you support the adoption of the Communication Guideline as included in this Change Proposal?	Jacana Energy	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	NTESMO notes Jacana’s request for a meeting which complies with clause 8.9 of the NT National Electricity Rules and will establish the meeting. The Communications Guideline and associated procedures provide the detail on the transactions proposed

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>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.</p>	<p>for the information exchange processes.</p> <p>Clause 8.9 of the NT NER governs the consultation process and this requires the consultation to conclude prior to the industry testing.</p> <p>Any changes identified through the industry testing can be included in future revisions to these procedures.</p>
2	Do you support the adoption of the Communication Guideline as included in this Change Proposal?	Power and Water	Yes. PWC supports the adoption of the Communications Guideline.	NTESMO notes the response from Power and Water.
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	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	All consultations will be conducted as specified by clause 8.9 of the NT NER. Jacana as a market participant can decide their involvement

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>consultation procedures. Further clarification is required to understand:</p> <ul style="list-style-type: none"> - the requirements for implementing the outcomes from these consultations (particularly in relation to system updates and procedural changes); - the frequency of consultation; and - the timing for implementation. 	<p>in analysing any future consultation documents.</p> <p>If a consultation results in a change in the information exchange processes & procedures then participants will be required to transact in accordance with the updated procedures.</p> <p>NTESMO will target having one consultation per annum with a six month lead time on implementation of the revised procedures. This will be influenced by the systems service provider's requirements.</p>
3	Do you support the stand-alone structuring of these documents and consulting under the Rules Consultation	Power and Water	Yes. The document structure enables sourcing of appropriate rules in a straight forward manner. Any future changes to the procedures should only be	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
	Procedure on future changes to these documents?		managed under the formal consultation rules to ensure participants are provided the opportunity to comment on changes to the procedures.	
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?	Jacana Energy	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.	<p>NTESMO notes Jacana’s request for a meeting which complies with clause 8.9 of the NT National Electricity Rules and will establish the meeting.</p> <p>Clause 8.9 of the NT NER governs the consultation process and this requires the consultation to conclude prior to the industry testing.</p> <p>The procedure documents currently under consultation provide sufficient technical detail to enable a detailed assessment of the implications of the proposed</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
				information exchange processes to be completed.
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?	Power and Water	PWC supports the use of MSATS in the NT. It will allow PWC to benefit from automated updates to site standing data and have one mechanism for receiving service requests from all retailers.	NTESMO notes the response from Power and Water.
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?	EDL Energy	Broadly, EDL supports the utilisation of platforms already established in the NEM, as outlined in the Paper. Using an existing system provides familiarity for many participants, and it should result in a cost-effective outcome. However, EDL would like to understand if any cost-benefit analysis has been performed to date, including a comparison to alternative systems?	NTESMO has investigated the use of the AEMO MSATS system against building a bespoke NT solution. The economies of scale through the use of the AEMO MSATS system would not be available through a bespoke system. Additionally participants can access software already utilised for the AEMO MSATS system rather than configure a stand alone NT solution.
5	Do you understand the distinction in responsibilities between NTESMO and AEMO?	Jacana Energy	Jacana Energy understands that NTESMO is the governing authority for the procedural documentation and that AEMO provides the MSATS system. Jacana Energy	NTESMO is contracting with AEMO for providing the MSATS system to a

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			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.	comparable service standard to the service provision in the National Electricity Market. The responsibility for data inconsistencies resides with the market participants who provide the data inputs into MSATS and not with NTESMO.
5	Do you understand the distinction in responsibilities between NTESMO and AEMO?	Power and Water	Yes. PWC understand AEMO is the service provider of MSATS and NTESMO retains the responsibility for publishing the procedures and operating the NT electricity market.	NTESMO notes the response from Power and Water.
6	Do you support the proposed new mechanism for the retail transfer of a customer?	Jacana Energy	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	Jacana Energy's support of the new customer transfer mechanism is noted. NTESMO notes the potential inconsistency between the Communications Guideline and the Electricity Retail Supply Code. NTESMO has been liaising with the Utilities

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>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.</p>	<p>Commission to align the requirements of the two instruments.</p> <p>NTESMO only controls the Communications Guideline consultation process and cannot influence the timing of any changes to the Electricity Retail Supply Code.</p> <p>If the Electricity Retail Supply Code is not amended then a new customer transfer request form will be submitted to the utilities commission for approval which will align with the Communications Guideline requirements.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
6	Do you support the proposed new mechanism for the retail transfer of a customer?	Power and Water	PWC is agnostic to who is the retailer for a site and supports the efficient recording and updating of the retailer for a site.	NTESMO notes the response from Power and Water.
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	Jacana Energy supports the adoption and continued use of NEM12 and NEM13 meter data file formats.	Jacana Energy's response is noted.
7	Do you support the adoption of NEM12 and NEM13 meter data file formats for the delivery of meter data under this Proposal?	Power and Water	PWC supports the adoption of the proposed meter data file formats.	NTESMO notes the response from Power and Water.
8	Do you support the list of available business to business transactions?	Jacana Energy	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.	NTESMO notes Jacana's request for a meeting which complies with clause 8.9 of the NT National Electricity Rules and will establish the meeting.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
8	Do you support the list of available business to business transactions?	Power and Water	PWC supports the list of available business to business transactions. PWC does not require any additional transactions at this time.	NTESMO notes the response from Power and Water.
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	Jacana Energy does not support life support process being managed under two separate regulatory protocols and recommends that the inconsistencies between the Electricity Retail Supply Code and the proposed Procedures be addressed through the Consultation process and changes made (if applicable) to the Code to ensure all parties are clear on their obligations. In particular, Jacana Energy notes that there are inconsistencies between the proposed life support process in the Procedures and the life support obligations set out in the Electricity Retail Supply Code. These inconsistencies will need to be addressed so that Jacana Energy can comply with its obligations under both the Electricity Retail Supply Code and the Procedures in the most efficient manner. In particular, the Procedure provides at paragraph 4.1(c) that 'Prior to sending a Life Support Request, it is expected that the prospective Retailer has obtained consent from the customer'. The Code does not currently require a consent from the customer in this context and this consent requirement	<p>NTESMO notes the potential inconsistency between the Communications Guideline and the Electricity Retail Supply Code. NTESMO has been liaising with the Utilities Commission to align the requirements of the two instruments.</p> <p>NTESMO only controls the Communications Guideline consultation process and cannot influence the timing of any changes to the Electricity Retail Supply Code.</p> <p>NTESMO notes Jacana Energy's suggestion for how</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>would be inconsistent with Jacana Energy's obligations under the Code. Additionally, there are inconsistencies between the expected response times to a life support notification in the Electricity Retail Supply Code and the Procedures. Jacana Energy, in consultation with Power and Water Corporation, has assessed the life support transaction data. The structured data set will provide additional assurance and the reconciliation process will assist with the ongoing management of life support customers. However, the introduction of the new procedure requires careful change management and therefore Jacana Energy requests further engagement with NTESMO to jointly manage the implementation of the processes and to make arrangements for the reconciliation of life support data. Jacana Energy is concerned with the high risks of transitioning from the existing life support processes to a new life support process set out in the Procedures. This process must be managed between all participants with extreme care. Jacana Energy requests the inclusion of additional risk mitigation and contingency plans for life support to the Power and Water implementation project, including but not limited to;</p> <p>- A separate detailed go/no-go based implementation criteria</p>	<p>to implement the new life support process and data reconciliation. This will be considered through the proposed market readiness process.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			- Roll back plan (utilising existing B2B processes)	
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.	Power and Water	The life support process is consistent with the current PWC process and is supported.	NTESMO notes the response from Power and Water.
10	Does the proposed mechanisms for the delivery and querying of meter data support the operational requirements of your organisation? If not please explain any concerns.	Jacana Energy	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.	<p>The Communications Guideline and procedures detail the format for information exchange processes. The requirements for timeliness in provision of meter data are not covered within the information exchange processes.</p> <p>NTESMO cannot find any requirements of meter data delivery within the life support sections of the Electricity Retail Supply Code.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
10	Does the proposed mechanisms for the delivery and querying of meter data support the operational requirements of your organisation? If not please explain any concerns.	Power and Water	PWC supports the proposed metering transactions via MSATS. They will meet the requirements of PWC.	NTESMO notes the response from Power and Water.
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	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.	Clause 8.9 of the NT NER governs the consultation process and this requires the consultation to conclude prior to the industry testing. Any changes identified through the industry testing can be included in future revisions to these procedures.
11	Are the detailed technical specifications sufficient for participants to design and commission the information systems necessary for it to engage with the	Power and Water	Yes the details are sufficient.	NTESMO notes the response from Power and Water.

Number	Question	Consulted Person	Participant Comments	NTESMO Response
	proposed information exchange processes?			
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	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.	Jacana Energy's response is noted.
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?	Power and Water	Yes. PWC supports the reuse of AEMO industry guides where available.	NTESMO notes the response from Power and Water.
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?	EDL Energy	For the same reason outlined above, EDL supports using NEM documentation where appropriate rather than developing bespoke documentation for the NT	NTESMO notes the response from EDL Energy.
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?	Jacana Energy	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	All procedures are published via a consultation conducted as specified by clause 8.9 of the NT NER. This provides all participants with the opportunity to contribute to

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>identified through the implementation of the new procedures.</p> <p>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.</p> <p>To mitigate this risk and to ensure that all parties fully understand the magnitude of the changes, Jacana Energy recommends the establishment of:</p> <ul style="list-style-type: none"> - 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 - 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. 	<p>the consultation and procedure setting process.</p> <p>A market readiness process is currently being implemented to provide all industry participants with visibility of the MSATS implementation program for all NT participants. This will provide a forum for continued engagement with market participants through the MSATS implementation process.</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
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?	Power and Water	The use of MSATS and the ability to align systems and processes with the NEM is the most efficient option for PWC. PWC supports standardising transactions between all retailers and PWC in the one format.	NTESMO notes the response from Power and Water.
14	What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Jacana Energy	<p><u>Assessment of full impact of changes</u></p> <p>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.</p> <p><u>Change management required</u></p> <p>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</p>	<p>NTESMO notes the comments from Jacana. A market readiness process is currently being implemented to provide all industry participants with visibility of the MSATS implementation program.</p> <p>There will be no MSATS accreditation process for the existing participants to complete as this will be managed by NTESMO.</p> <p>Change management for each participant is an internal process which is not within the remit of NTESMO.</p>

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			<p>parties can adopt and implement specific NTEM procedures in conjunction.</p> <p><u>Cost challenges associated with implementation</u></p> <p>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. <u>Inconsistencies with other regulatory obligations</u></p> <p>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). <u>Ongoing consultation process</u></p> <p>Further clarification is required regarding the ongoing consultation process and the impacts over the long term.</p>	<p>NTESMO notes the potential inconsistency between the Communications Guideline and the Electricity Retail Supply Code. NTESMO has been liaising with the Utilities Commission to align the requirements of the two instruments.</p> <p>NTESMO only controls the Communications Guideline consultation process and cannot influence the timing of any changes to the Electricity Retail Supply Code.</p> <p>If the Electricity Retail Supply Code is not amended then all necessary updated forms and procedures will be submitted to the utilities commission for approval which will align with</p>

Number	Question	Consulted Person	Participant Comments	NTESMO Response
			<p>For example, how will new versions of the procedures be managed and what is the timeframe for implementing future versions?</p>	<p>the Communications Guideline requirements.</p> <p>All future consultations will be conducted as specified by clause 8.9 of the NT NER. Jacana as a market participant can decide their involvement in analysing any future consultation documents.</p> <p>If a consultation results in a change in the information exchange processes & procedures then participants will be required to transact in accordance with the updated procedures.</p> <p>NTESMO will target having one consultation per annum with a six month lead time on implementation of the revised</p>

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				procedures. This will be influenced by the systems service provider's requirements.
14	What are the main challenges in adopting these proposed changes? How should these challenges be addressed?	Power and Water	Main challenge is a new method of operating and transacting and each participant needs to manage their own system and change management process.	NTESMO notes the response from Power and Water.
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.	Jacana Energy	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	Jacana Energy's response is noted. NTESMO is targeting aligning procedures and systems with the National Electricity Market (NEM). NTESMO acknowledges that if the participants require the procedures to vary from the NEM procedures then this situation could occur. NTESMO will be guided by the feedback received from participants on the proposed procedures.

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			associated with efficiencies gained through streamlined and standardised processes may be eroded.	
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.	Power and Water	The benefit is alignment with the NEM and lower customisation costs on PWC software to share information exchange with the market participants. The customer will benefit as PWC will have one process for managing all retailer requests which will facilitate a more efficient delivery of services.	NTESMO notes the response from Power and Water.
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	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	NTESMO notes the proposed date is 2 October 2023. NTESMO notes the comments from Jacana. A market readiness process is currently being implemented to provide all industry participants with visibility of the MSATS implementation program. This will form part of the process on the confirmation of the final go live date.

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			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.	Any changes identified through the industry testing can be included in future revisions to these procedures.
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?	Power and Water	The time is actually 2 October 2023 and this does provide PWC enough time to be ready for this change.	NTESMO notes the response from Power and Water.
17	Do you have any other suggestions, comments or questions regarding this consultation?	Jacana Energy	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.	Clause 8.9 of the NT NER governs the consultation process and this requires the consultation to conclude prior to the industry testing. Any changes identified through the industry testing

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				can be included in future revisions to these procedures.
17	Do you have any other suggestions, comments or questions regarding this consultation?	Power and Water	Nil.	NTESMO notes the response from Power and Water.
17	Do you have any other suggestions, comments or questions regarding this consultation?	EDL Energy	<p>Furthermore, if NTEM SO intends to recoup these ongoing costs via System Control and market operator fees, EDL would like to understand:</p> <ul style="list-style-type: none"> •the proposed mechanism for cost recovery (i.e. per MWh generated/traded, no. of customers, etc.); and •how these proposed fees compare to the existing fees being borne by participants. 	<p>The System Control and Market Operator fees are set by the Utilities Commission under a price determination process. The fees are currently set until 30 June 2024.</p> <p>NTESMO will apply to the Utilities Commission for recovery of the fees related to the Communications Guideline for the period from 1 July 2024.</p> <p>The current fees are charged per MWh to the retailers operating in the NTEM.</p>

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17	Do you have any other suggestions, comments or questions regarding this consultation?	NTESMO	Removal of Notified Parties through the documents as these will not be used in the NT. The CATS Procedures require updating as the <i>Meter Use</i> field can be used to record where a site has a PREPAID meter rather than the <i>Network Additional information</i> field	Changes made to the procedures as detailed.

Contact

Senior Manager Electricity & Market Reform
Core Operations
Market.operator@powerwater.com.au
powerwater.com.au

PowerWater