Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

***Participant**: Alinta Energy*

***Submission Date**: 3rd April 2023*

Classification: INTERNAL

Table of Contents

1. Context

This template is to assist stakeholders in giving feedback about the options detailed in the issues paper associated with the Integrated Energy Storage Systems consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

2. Consultation questions

NMI Classification Code amendments

Question	Participant Comments
1. Do you agree that the proposed new NCCs address the requirements for compliance with the IESS Rule outlined by AEMO? If not, please specify your reasoning and any alternative options relevant to the IESS rule.	Agreed.
2. Are there any gaps or issues with the proposed NCC definitions as they relate to the IESS Rule, noting that issues beyond the scope of the IESS Rule will be dealt with through separate processes?	No Comment
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	Alinta believes there will be significant changes to our internal systems to collect/store this information.

Classification: INTERNAL

AEMO to understand the impact of the proposed changes?	

Amendments to terminology

Question	Participant Comments
4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?	No Comment
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	Given the magnitude of change to the Alinta business/systems and other market participants, there would be an expectation that the market operator ensures everyone is good to go via a formal readiness program.

Other matters - ICF_070 Increase 'Building Name' Field Length in MSATS

Question	Participant Comments
6. Do you agree with the proposed change to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document? If not, please specify your reasoning.	Agreed

Other matters - ICF_059 CATS clarifications plus NMI Classification Review

Question	Participant Comments

Classification: INTERNAL

7. Do you agree that Option 1 would most effectively and efficiently resolve the issue of NEM Participants not being able to identify a customer's non-registered or non-classified generation capabilities easily and accurately? If no, please specify your reasoning.	Alinta does not agree the proposed solution. Alinta believes there are numerous issues with this solution. a) The proposal to change NMI Customer Classification - NCC, especially how 'Large' and 'Small' customers with generation capabilities will be categorized, will result in some Small customers being recategorized as 'Large'. This will impact the CATS transactions in the CATS procedures. The CATS procedures will need to change as they specifically reference the NCC. Some CATS transactions are only available to Small Customers.e.g., Reversal of a transfer. b) Changing the NCC as proposed is extremely invasive on most participants systems. The NCC is a fundamental piece of information that drives operational and compliance processes, especially in metering businesses but also in retailers and DNSPs. There are over 95 NER obligations that apply specifically to 'Small Customers' and participants have developed systems to refer to the NCC to know when these apply and when they do not. For example, Meter Installation timeframes, Small and Large have different timeframes. All participants will need to review their processes and systems to revise or extend the logic or refer to other fields. This change has been put up as the most cost effective when in Alinta's view it is not. Out of all the alternative solutions it feels like the most expensive and highest risk as it impacts so many participants and so many processes. Alternative solutions can provide a lower risk and isolate the change to participants who want to use this information. c) It is unclear that the case has been made for the industry to embark on significant changes to avoid the issues of misquoting. The supporting information to the ICF presented at the ERCF suggests that retailers require independent verification of a customer's potential system generation capacity rather than taking the customer's word for it when preparing a quote. Any issue related to retailers being 'locked in' to a quote or contract based on incorrect information

Classification: INTERNAL

	provided by the customer can be dealt with by the retailer's Terms and Conditions. d) Alinta believes there is sufficient information in MSATS regarding the customer's volume of generation exported into the market already to support the retailers to avoid misquoting. The supporting information presented to the ERCF by the sub-group disregards this as an option without proper consideration (see below). It is our view that this is still a live option.
e) Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.	An alternative option could be: ADL on the 'B' DataStream contained within the CATS_NMI_DATASTREAM is available for use. This can provide an average daily generation value that retailers can use in preparing quotes. The supporting material provided to the ERCF suggests that this is not sufficient as the DataStream in MSATS is reflecting a net value (Consumption minus Generation). However, this is not the case. Since 5MS MDP's are obligated to establish 'register' level Data Streams, which exposes an ADL for both consumption 'E' and Generation 'B'. All meters that are recording 5-minute data (approx. 2 million) have been converted to register level data streams. CATS no longer allows for any transactions that creates or maintains a net 'N' DataStream so over time all remaining meters will get converted to a register level DataStream. AEMO has previously stated a desire to move away from 'N' DataStream as quickly as possible as allows for more accurate settlement and for UFE calculations there remains the ability to accelerate the creation register level DataStreams for all existing sites with local generation.
a) Do you agree that the creation of a new NCC to identify Standalone EV Charging Stations would add value to the market? If no, please specify your reasoning.	Alinta does not agree. It is unclear what the driver is to classify public EV charging stations differently to any other loads and the issue paper does not provide any insight. We are not aware of any regulation that says EV charging stations have different requirements to any other Business, Small or Large, connection. As mentioned above

Classification: INTERNAL

	changing the NCC is extremely invasive to participant systems and processes and if there is a requirement to do so then this needs to be carefully considered. Under the obligations of the NER/NERR/NERL EV's will be treated the same as any other connection. i.e. If Load is small enough then NER/NERR 'Small Customer 'provisions will apply.
b) Do you agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS? If not, please specify your reasoning.	Agreed.
c) What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	AEMO must consider the impact of the industry agreed solution on participants systems and processes. Should the consultation decide that the proposed solution described in ICF-059 should be adopted then all participants will need adequate time to review all their processes and systems and make the necessary adjustments. As already indicated, the proposed change is highly invasive on participant systems and therefore will require a large amount of effort to identify all areas that are. Subsequent use of "Small" and "Large" terminology throughout all market procedures will also need to be reviewed for clarity, especially to prevent confusion around treatment of residential customers who are Small Customers under the retail regulatory requirements, but their NMI Classification Code is proposed to be changed to Large due to their consumption exceeding consumption thresholds traditionally only applicable to business customers.

Classification: INTERNAL

3. Procedure Drafting Changes

Retail electricity market procedures – Glossary and Framework

Section	Description	Participant Comments
Figure 1	Modify diagram to represent bi-directional flows of energy instead of uni-directional flows	Agreed in concept
2.6.2	Include *integrated resource systems* as a term that is included in the WIGS Procedures	Agreed in concept
4.1.2	Remove *market loads* and replace with *market connection points*	Agreed in concept
Glossary	Remove the following terms: • First Tier NMI • First Tier Load • Second Tier NMI • Second Tier Load • Tier 1 Site • Tier 2 Site Include the following term: • Financially Responsible Add *Integrated Resource Provider* to the definition of FRMP	Agreed in concept

Classification: INTERNAL

MSATS CATS

Section	Description	Participant Comments
2.2 Financially responsible market participant	Part (d) Delete 'Ensure that only small generating unit connection points are assigned to the relevant MSGA' and replace with 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator' Delete sections (i) and (j) and replace with: 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'	Agreed in concept
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	Agreed in concept
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	Agreed in concept
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	Agreed in concept

Classification: INTERNAL

Section	Description	Participant Comments
Table 4-H-Datastream Status Codes	Remove reference to second tier retailer Part (d) If a retailer transfer CR is Completed the Datastream Status Code must be 'A' when the NMI is energised.	Agreed in concept
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	Agreed in concept
15.2.3 Requesting Participant Requirements	Remove the following field as a selection option from the BCT: The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	Agreed in concept

MSATS WIGS

New NCCs are proposed to be included in the Condition Precedent component of the Wholesale, Interconnector, Generator and Sample (WIGS) procedure. The existing system constraints are unchanged for each participant requirement, timeframe and objection for each change request submitted.

Change Request type	Section	Conditions Precedent	Participant Comment
Change Retailer	2.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	-N/A
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	-N/A

Classification: INTERNAL

Change Request type	Section	Conditions Precedent	Participant Comment
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	-N/A
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	-N/A
Create NMI, Metering Installation Details and NMI Datastream	4.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	-N/A
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	-N/A
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	-N/A
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Create and Maintain Datastream – Change Requests	6.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A

Classification: INTERNAL

Change Request type	Section	Conditions Precedent	Participant Comment
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	-N/A
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	-N/A
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	-N/A
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	-N/A
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
Change MPB or MPC or Both	8.6.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	-N/A

Section	Description	Participant Comments
9.2.3	Remove the following field as a selection option from the BCT: The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	Agreed in concept

Classification: INTERNAL

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	Agreed in concept
3.5	Remove reference to 'first tier load'	Agreed in concept
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	Agreed in concept
12.8.2	Remove reference to 'first tier controlled load' and 'second tier controlled load' and include market customer. In 12.8.2 Load Profiling (a) and remove first tier from 12.8.2 Load Profiling (b) and include market customer.	Agreed in concept

Metrology Procedure Part B

Section	Description	Participant Comments
10.3	Bi-directional units may have multiple sources of generation and load behind the connection point. For sites that are scheduled units, AEMO provides SCADA data for generating units. Validation of metering data for connection points	Agreed in concept

Classification: INTERNAL

Section	Description	Participant Comments
	where SCADA is made available includes NCCs of DGENRATR and Small Resource Aggregator. New clause to reference bi-directional units where validation should occur for SCADA data suffixes of E and B channel data.	
12.3	Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.	Agreed in concept
13.1	Change all references in section 13.1 from Market Load to Market Connection Point	Agreed in concept
13.5	Change reference from 'market load' to *market connection point*	Agreed in concept

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	Agreed in concept

Classification: INTERNAL

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with *distribution connected unit*.	Agreed in concept

Exemption Procedure Data Storage Requirements

Section	Description	Participant Comments
2.1	Remove reference to *transmission connection point* and *distribution connection point* where the FRMP is a *Market Generator* or *Market Small Generation Aggregator* to reflect the Rule Change 7.8.2(b1).	Agreed in concept

Guide to the Role of the Metering Coordinator

Section	Description	Participant Comments
4.1	Remove *small generating units* and *market generating units* and include *non-market bidirectional units* and *small resource connection point.*	Agreed in concept

Classification: INTERNAL

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	Agreed in concept

Service Level Procedure: MDP Services

Section	Description	Participant Comments
3.13	Include new NCCs of XBOUNDRY, BULK, DGENRATR, DIRS and TIRS for connection points required to provide 90% of complete actual metering data by 8am for the day(s) specified for prudential purposes.	Agreed in concept

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	Agreed in concept

Classification: INTERNAL

Metering Data Provision Procedures

Section	Description	Participant Comments
4.3	Include a new energy flow type that reflects the purpose of the rule change to include bidirectional energy flows for generation connection points.	Agreed in concept

Classification: INTERNAL