

Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

Submission Date: 3 Apr 23

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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.	Yes. The proposed new NMI Classification Codes (NCCs) seem to be suitable to address compliance requirements for the IESS Rule.
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?	Use case where 2 NMIs are no longer required and the 1 NMI gets a NCC of NREG, there is a potential risk that you lose visibility if the customer is to be treated as small or large.
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	Whilst there will be an impact introducing the new NCCs defined in this section of the issue paper, to systems and processes, PLUS ES believes the impacts of the proposed

AEMO to understand the impact of the proposed changes?	changes should not be significant. Downstream impacts can be further determined once procedural changes are detailed. PLUS ES supports the proposed transition and implementation of the new NCC with the caveat that NCC updates are visible to all participants via C1 reports and CR notifications.
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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?	The terminology impacts seem to be reasonable – Difficult to confirm with any certainty until the marked-up impacts to the Procedures are available.
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	PLUS ES have no view for a formal readiness program as it is currently assumed we will be largely unaffected by the above.

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.	PLUS ES support the proposed change to increase the 'Building Name' field length in MSATS – alignment between market systems and applications delivers the most efficient outcomes.

Other matters - ICF_059 CATS clarifications plus NMI Classification Review

Question	Participant Comments
General	This issue paper's approach omitted some of the detail which normally accompanies a consultation paper and is required to apply due diligence in the review process. The proposed changes were generic, more specifically for the below points of section 5.2.4. 3. The amendment of existing SMALL and LARGE NCCs to exclude sites with generation $\geq 10\text{kVA}$ per phase. 4. Changes to the allocation of Residential sites to the 'SMALL' NCC, as the Customer Classification Code field already differentiates between Residential and Business customers. 5. Minor editorial changes to the Customer Threshold Limits in CATS to include the applicable Jurisdictional limits. The above reason combined with the 'non provision' of marked up procedures, the issue paper could not be considered a standalone consultation paper. It would have been difficult for participants who were not part of the ERCF or had access to ERCF meeting packs to readily understand the proposed changes.
7. Do you agree that Option 1 would most effectively and efficiently resolve the issue of NEM Participants not being able to easily and accurately identify a customer's non-registered or non-classified generation capabilities? If no, please specify your reasoning.	PLUS ES does not support that Option 1 (The addition of NCCs into MSATS) for the purpose of ICF_059, as per below points: The Issue: <i>NEM Participants are unable to easily and accurately identify a customer's non-registered or non-classified generation capabilities in the CATS system/procedures.</i> This information can be derived by interested participants from existing information already available via Market systems and databases, such as MSATS and DER register.

	• Option 1 will introduce greater complexity in system and business processes- requiring all participants who rely on the NCC field to assess the logic accordingly and make necessary changes. • An option analysis with an associated cost benefit was not made available for participants to evaluate and qualify. To our knowledge the issue has not been quantified/sized or if it is available, it has not been provided. What are the volumes of such NMIs? How often does one need that information? • The approach or preferred option of the subgroup was not visible until late Jan (ERCF presentation) and there wasn't sufficient opportunity to discuss the issue in detail and determine if it should be included in a consultation. That is, there was enough concern in the forum making it evident that the discussion on the proposed had not been exhausted to go to consultation. • The NCC field is also used in determining if a customer is large or small especially from Rules compliance obligations. Whilst the use of the NMI is required knowing if the customer of the NMI is large or small is more important. Additional enumerations to this field could make the determination of the basics more complex. The more complex the logic the greater the likelihood for errors or breakpoints. • GSMALL/GLARGE – in addition to not supporting proposed NCC changes, PLUS ES recognises the requirement for 10kVA limits but is perplexed with the reasoning and the value in the industry. See scenarios below.
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	○ A customer has 10kVA of generation on one phase and another customer has 9.8 kVA, why is it important to know that Customer A has a GSMALL NMI as opposed to customer B who will have a NCC = SMALL. ○ Customer A has 10kVA of generation on a 1 Phase site whilst Customer B has 3 Phases and 9.8 kVA on each phase. Customer A would have NCC= GSMALL and Customer B NCC=SMALL. ● Changes to the allocation of Residential sites to the ‘SMALL’ NCC, as the Customer Classification Code field already differentiates between Residential and Business customers. PLUS ES does not support the proposed change for the below reasons: ○ The existing residential definition for the ‘SMALL’ NCC was recently added to the table to ensure that the industry was aligned with Rules/legislation which state that residential customers irrespective of their consumption will be classified as Small. Removing this classification could lead to incorrect interpretations, non-compliances etc, creating downstream issues for market participants and reverting back to where the industry was prior to the change. ○ The proposed change will require industry participants to remove the changes they recently implemented and then build additional logic to classify a NMI as a Small/Large customer, where the LNSP currently populates the NCC. ○ The <i>impact</i> which requires the definition to be removed has not been clearly articulated, just identified as significant impact. ○ Does not meet the NEO objective.
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8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.	PLUS ES believes that there are alternative options better aligned to deliver overall efficiencies to the proposed Option 1. • Distributed Energy Resources (DER) register (Option 3) – PLUS ES supports this option as the most efficient and optimal solution to meet the NEM reform requirements. Recognising that enhancements will need to be delivered. This register was created to record and provide information about DERs. Generating units, EV charging stations, Batteries and any other clean energy technological innovation can be captured in this DBoR, ○ Providing viewing access to industry participants who have a financial interest in the NMI, would be an efficient option to support operational requirements such as product offerings, network stability or management of data. ○ The DER register can be maintained as the source of truth (outside the customer), as it holds information about the NMI. Introducing a replica of information already recorded, increases the likelihood of data derogation and misalignment. ○ The DER register would be able to provide participants additional details in addition to the arbitrary assumed generating capacity which the proposed NCC could only deliver. It could provide a view if there is solar, battery, EV installed at the site etc and all the recorded attributes of the DER which are being captured. ○ Increasing the use of the DER register could also mitigate requirements for jurisdictions to create their own localised stand-alone CER registers etc.
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	In the absence of DER access, PLUS ES understand that some participants may have a need to identify Generation on a NMI and the size. That information is currently available to them via their customers or market systems which they could make readily available to their operations as required; an alternative to imposing a cost across all market participants. Information available includes – Datastreams for B channels, ADL at register levels i.e. generation, consumption etc
9. 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.	PLUS ES does not support creating a new NCC to identify a standalone EV charging station: - The DER register would be the optimal DBoR to capture this information (as noted in PLUS ES response to Question 8); including the EV attributes proposed in the ESB EV issues paper. - It is not understood why there is a requirement to treat these NMIs differently and not enough detail was provided to qualify the request. These NMIs will be consuming load and eventually could also generate back into the grid etc. They can still be classified as SMALL, LARGE etc, data will still be required to be collected and the customer invoiced etc. If anything, we would have assumed that identifying EV charging stations irrespective if they are standalone would be more valuable.
10. 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.	There is some ambiguity as to what editorial changes AEMO is referencing as this has not been clearly articulated/depicted in the issues paper. We are assuming to the below proposed presented in Feb's ERCF meeting pack:

	<table><tr><th>Customer Threshold Code</th><th>Description</th><th>Jurisdiction</th><th>Energy Volume</th></tr><tr><td rowspan="2">LOW</td><td rowspan="2">Consumption is less than the 'lower consumption threshold' as defined in the National Energy Retail Regulations.</td><td>ACT, NSW, QLD</td><td><40 MWh</td></tr><tr><td>TAS</td><td><40 MWh</td></tr><tr><td rowspan="2">MEDIUM</td><td rowspan="2">Consumption is equal to or greater than the 'lower consumption threshold', but less than the 'upper consumption threshold', as defined in the National Energy Retail Regulations.</td><td>SA, Vic</td><td><40 MWh</td></tr><tr><td>ACT, NSW, QLD</td><td>>=40 MWh <100 MWh</td></tr><tr><td rowspan="2">HIGH</td><td rowspan="2">Consumption is equal to or greater than the 'upper consumption threshold' as defined in the National Energy Retail Regulations.</td><td>TAS</td><td>>=40 MWh <150 MWh</td></tr><tr><td>SA, Vic</td><td>>=40 MWh <180 MWh</td></tr></table>	Customer Threshold Code	Description	Jurisdiction	Energy Volume	LOW	Consumption is less than the 'lower consumption threshold' as defined in the National Energy Retail Regulations.	ACT, NSW, QLD	<40 MWh	TAS	<40 MWh	MEDIUM	Consumption is equal to or greater than the 'lower consumption threshold', but less than the 'upper consumption threshold', as defined in the National Energy Retail Regulations.	SA, Vic	<40 MWh	ACT, NSW, QLD	>=40 MWh <100 MWh	HIGH	Consumption is equal to or greater than the 'upper consumption threshold' as defined in the National Energy Retail Regulations.	TAS	>=40 MWh <150 MWh	SA, Vic	>=40 MWh <180 MWh
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		SA, Vic	>=40 MWh <180 MWh																				
11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	PLUS ES does not object to this change, noting generally our preference is to avoid re-iterations of customer thresholds across multiple tables. This creates a larger administrative burden and has a risk that any future updates to jurisdictional thresholds get missed. PLUS ES recommends that the effective date should be commensurate to the impact of the change on participants systems, as well as other deliverable initiatives. That is, for the: ○ Building Name field Length – the effective date could be effective on the next schema change which will allow participants to make the system change as it is considered a minor change. ○ Proposed ICF 059 NCC – these changes are significant and if AEMO determines to proceed, should allow a sufficient time for the participants to undertake the analysis and implement the solution. i.e. >12 months from publication of final procedures. ○ CCT editorial changes – If they are editorial only, one can assume that there is no impact. The effective date could align with the next effective date of the CATS procedure.																						

3. Procedure Drafting Changes

Section	Participant Comments
General	With this Issue Paper no marked up procedures were included. It is difficult to exercise due diligence and undertake an effective review without the marked-up procedures, as: ○ One person's interpretation is not necessarily another's. ○ Generally one individual word could alter the intent or meaning of a clause/obligation. PLUS ES is also asking whether the process has been amended. It is evident from the below that AEMO has a position on what changes are required but this has not been shown. It would have been more efficient if the procedures had included the amendments and stakeholders could comment on the marked-up version.

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	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

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 <i>Integrated Resource Provider</i> to the definition of FRMP	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
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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'	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	See comment in Question 2. PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

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.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
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)	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

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	
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	

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	
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	
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	
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Create and Maintain Datastream – Change Requests	6.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	

Change Request type	Section	Conditions Precedent	Participant Comment
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
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	

Change Request type	Section	Conditions Precedent	Participant Comment
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	

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)	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
3.5	Remove reference to 'first tier load'	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Section	Description	Participant Comments
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.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

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 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.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
12.3	Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Section	Description	Participant Comments
13.1	Change all references in section 13.1 from Market Load to Market Connection Point	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.
13.5	Change reference from 'market load' to <i>market connection point</i>	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Exemption Procedure Data Storage Requirements

Section	Description	Participant Comments
2.1	Remove reference to <i>transmission connection point</i> and <i>distribution connection point</i> where the FRMP is a <i>Market Generator</i> or <i>Market Small Generation Aggregator</i> to reflect the Rule Change 7.8.2(b1).	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Guide to the Role of the Metering Coordinator

Section	Description	Participant Comments
4.1	Remove <i>small generating units</i> and <i>market generating units</i> and include <i>non-market bidirectional units</i> and <i>small resource connection point</i> .	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

Service Level Procedure: MDP Services

Section	Description	Participant Comments
3.13	Include new NCCs of XBOUNDARY, 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.	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	PLUS ES cannot make specific comment as the draft procedures have not been provided and the proposal is a little ambiguous.

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.	PLUS ES cannot make specific comment as the draft procedures have not been provided and the proposal is a little ambiguous.