

Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: SA Power Networks

Submission Date: 23 March 2023

Table of Contents

- 1. Context 3
- 2. Consultation questions 3
- 3. Procedure Drafting Changes 7

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.	SA Power Networks provide general support.
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	These changes will required SA Power Networks to make both process and system changes to support the new NMI Classification Codes. Our current assessment is that this is a Medium size change to implement across our systems (so will require a fair amount of work to support the suggested changes).

AEMO to understand the impact of the proposed changes?	
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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?	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?	No comment.

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.	SA Power Networks support this change.

Other matters - ICF_059 CATS clarifications plus NMI Classification Review

Question	Participant Comments
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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.	No - SA Power Networks does not support this proposed change or option. • Retailers should source information from the customer directly – if this information is needed to form part of a retail offer, given the range of DER capabilities and variable options of how these are used by customers (either current or potentially new capabilities), then Retailers should source the information they required directly from the customer at the time of sign up. Accountability for obtaining the required information to form contracts must remain a Retailer obligation and it is unclear why a Q&A process isn't the most efficient way for Retailers to gain the required information they need to determine what product offerings can be presented to customers. Additionally, we would expect that Retailers would require recorded evidence to specific Q&A's (DER being just one import piece of information provided) should they need to go back to the customer to alter contract arrangement. • Accuracy of information – we agree that Retailers need to understand what DER capabilities customers have at their site and where the Retailer is not able to obtain the information directly from the customer or is concerned about the accuracy of information provided by a customer, then they should be provided access to the most accurate source of information – AEMO's DER Register, which already holds the most detailed information available for all sites (noting that this information is being maintained on a daily basis). • Additional NMI Classification Code values unlikely to be the answer - industry expects the range of product offerings made available to customer will continue to evolve over the coming years, with a significant program of work just underway to support the NEM 2025 range of initiatives. Given the lack of clarity of what will be required to support industry over the coming years, making changes at this time (ahead of understanding the full set of requirements) will likely result in costly rework for industry or worse, wasted costs for changes made now that do not support the full set of future requirements. Making changes once should be the industries aim (when certainty of requirements is known) and it would appear these changes are narrow focused and piecemeal (noting that from a design perspective, it is unlikely that a
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	single field will be able to ever provide the required information needed by Retailers regarding customers energy needs and usage). • Complexity and Duplication - the proposal turns a simple field into a complex field which would require multiple variables to be considered (some of which are outside of the LNSP's control and reliant on data provided by MDP's) to determine a field value. Complex fields are costly to build and maintain and we strongly oppose creating costs for industry via duplication of information or effort (noting previous comments regarding "Accuracy of information"). • Changes are not simple – it appears that the changes have been presented as easy and administrative; this is not correct. A full impact assessment should occur to understand the size of this change to industry and only if significant benefits can be presented (benefits that can not be achieved via simpler and less costly solutions) should these changes be considered further. • Obligation impacts – we have concerns that a full impact assessment to policy, procedure and system logic has not occurred (given the reliance on small and large classification by industry) and suggest that this should be addressed prior to further consideration of this change.
8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.	Yes – please see comments within Q7 response.
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.	No – please see comments within Q7 response.

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.	No – changes were made in 2020 and it is unclear what policy changes have occurred that require this to be revisited and impose further costs and rework for industry.
11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	SA Power Networks do not support this change, however, if this was to proceed, a minimum of 12 months follow the publishing of the final determination would be required.

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	No comment.
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	No comment.
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	No comment.
Glossary	Remove the following terms: - First Tier NMI - First Tier Load - Second Tier NMI	No comment.

	• 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	
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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'	No comment.

Section	Description	Participant Comments
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	No comment.
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	No comment.
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	No comment.
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.	No comment.
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	No comment.
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)	No comment.

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	No comment.
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	No comment.
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	No comment.
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	No comment.
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	No comment.
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No comment.
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No comment.
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.

Change Request type	Section	Conditions Precedent	Participant Comment
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	No comment.
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	No comment.
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No comment.
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No comment.
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No comment.
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.
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	No comment.
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No comment.

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)	No comment.

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	No comment.
3.5	Remove reference to 'first tier load'	No comment.
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	No comment.
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.	No comment.

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.	No comment.
12.3	Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.	No comment.
13.1	Change all references in section 13.1 from Market Load to Market Connection Point	No comment.
13.5	Change reference from 'market load' to <i>market connection point</i>	No comment.

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	No comment.

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	No comment.

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).	No comment.

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> .	No comment.

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	No comment.

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.	No comment.

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	No comment.

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.	No comment.