

Load Profiling Methodologies

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *Load Profiling Methodologies*.

2. Feedback on Load Profiling Objectives and Principles

Question	Participant Comments
<p>1. Do you agree with the proposed objectives and principles?</p>	<p>AGL considers that the proposed Objectives and Principles are appropriate for this consultation.</p>
<p>2. Are there any other objectives and principles you believe should be considered?</p>	<p>At this stage, the objectives are appropriate. However, AGL notes that the conversion of existing meters to 5 min meters will accelerate during the last months of 2022 and the rollout of new meters may accelerate following the AEMC review.</p> <p>As such, AGL strongly suggest that some sort of reporting or review mechanism be put in place to consider the methodology in use and evaluate if the methodology chosen is appropriate in an environment with a significant increase in the number of 5 min meters, and similar reductions in 30/15 and accumulation meters.</p> <p>It may be that different profiling mechanisms are needed in those jurisdictions moving from predominantly accumulation to 5 ms, versus those which may be predominantly 30 min (ie Vic) for many years to come.</p>

3. Feedback on Load Profiling Methodologies

Question	Participant Comments
<p>1. Which methodology do you consider would best achieve the objectives and principles? Why?</p>	<p>AGL agrees with the assessment undertaken by AEMO and the industry working group that Option 5 or 6 seem to be the best choices at this time.</p> <p>At this stage it's very difficult to be clear whether the issue with Option 5 (negative gradient) or the issue with Option 6 (magnitude) is more problematic.</p> <p>AGL is very aware that due to the magnitude and variability of the real data the ability to sandbox these proposals to make a better determination prior to implementation of either option is not possible.</p> <p>It is also not clear whether both Option 5 and Option 6 can be implemented and the profiling system be switched between the two options (at least for the purpose of assessment) against real data.</p> <p>Assuming that only one option can be implemented, then at this stage AGL considers that Option 5 may be the better choice. However, AGL notes that the choice of option 5 or 6 is very close and can see both benefits and issues with both. If more information comes to light suggesting Option 6 is more appropriate, AGL would accept that choice.</p>

Question	Participant Comments
<p>2. Do you consider that an alternative methodology would better achieve the objectives and principles? Please note that the selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analysis and test this alternative.</p>	<p>AGL considers the other options are less effective (in the current environment), but again considers that the types of meter data being provided to the market are rapidly changing, and that the profiling methodologies will need to keep up with these changes.</p>
<p>3. Do you believe the preferred methodology should be applied to both 5MLPs and NSLPs where the observed conditions have been met? If no, why?</p>	<p>AGL considers that the application of the profiling methodologies should be minimised and applied only where necessary and therefore does not support the application of the methodology to both 5MLPs and NSLPs at this stage. As stated in the discussion paper, the NSLPs require a longer period (365 days) for analysis.</p> <p>AGL does consider that once the initial profiling methodology is implemented for the 30/15 minute meters, the NSLP should be monitored with a view to updating the NSLP profiling post the 365 day period if warranted.</p> <p>Noting the time to implement such a solution for the NSLP, AGL wishes to understand if there will be sufficient indicative data by Dec 2023 to warrant commencing a consultation – times for May 2024 – to update the NSLP.</p>

Question	Participant Comments
<p>4. When do you consider the preferred methodology should be implemented? On 30 May 2023?</p>	<p>AGL notes the proposed implementation date – but as this may cause extended problems which may not be visible or understandable until final revisions, AGL proposes that Settlement revisions be allowed if this change shows unusual occurrences up to final revisions.</p> <p>When the previous change was made in 2021, Participants had some expectations that issues would be washed up in final revisions. This was not the case. As such, with this form of change to the profiling mechanisms, AGL strongly suggest that additional allowances be made for an additional revision to resolve any unintended consequences and keep participants whole.</p> <p>AGL believes that careful attention needs to be paid to the transition period between methodologies to ensure consistency in profiles are maintained so that disaggregated meter reads closely reflect actual shape to prevent the undesirable situation that occurred during the transition on 1 Oct 2021.</p>

4. Feedback on proposed Other Matters

Question	Participant Comments
1. Do you agree that the proposed amendments associated with obtaining and applying embedded network codes provide for the correct interpretation of the procedures, as well as achieving industry objectives? If no, then please provide a better alternative.	AGL notes that the matter is more for DNSPs but supports this change.
2. Do you agree that the inclusion of the 'House Number To Suffix' element enables a better quality site address to be recorded for energy participants? If not, please specify your reasoning.	AGL supports this change. Addressing is a key issue within the industry and industry data needs to be as accurate and complete as possible.
3. Do you agree with the proposal to removal of the current NMI Discovery Type 3 validation? If not, please specify your reasoning.	AGL supports this change. There are NERR obligations to correct 'won in error' transfers up to at least 12 months. There are also situations of crossed meters which require a coordinated approach. As such, barriers to supporting these obligations should be removed.

5. Other Issues Related to the Load Profiling Methodologies and Other Matters

Stakeholders to provide details of other Load Profiling Methodologies related aspects that have not been included in the issues paper and provide details.

Participant Comments
<p>AGL notes that there is a confluence of events occurring within meter data and wholesale settlements and retail allocations. This ranges from the conversion of meters to 5ms, rollout of replacement meters to 5ms and the allocations of UFE, which is directly affected by the profiling outcomes.</p> <p>As such, AGL considers that it will be very difficult to separate and isolate the impact of all these factors easily, or at all, and urges AEMO to consider developing some sort of analysis / reporting process for the profiling methodology in use, as well as tracking the number of 5ms meters vs non-5ms meters that are installed for the foreseeable future.</p> <p>AGL notes that while the issue of UFE already has a reporting framework being developed, that framework is independent of these other matters.</p>