LOAD PROFILING METHODOLOGY CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

Submission Date: *12 Jan 2023*

Table of Contents

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the draft procedures associated with the Load Profiling Methodology consultation.

The changes being proposed are due to an issue identified where negative load profiling values were present requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. Question on Load Profiling Methodology Implementation Date

Heading	Participant Comments
Do you agree with AEMO's proposed implementation date of 1 October 2023? If not, why?	AGL notes AEMO's proposed reasoning for moving the implementation to 1 October so as to reduce price volatility. However, in light of the reasoning provided by AEMO, AGL suggests that final implementation of the profiling methodology should be by Notice, rather than establishing affixed date. As such, AEMO should monitor the market for volatility, and if the market conditions are not sufficiently stable, then AGL proposes that AEMO should defer the implementation to the start of the next settlements period and so forth. Given the mechanism for the changes last year, AGL also suggests that AEMO should provide pre and post advice of implementation – including settlements distribution lists.

3. Metrology Procedure Part B

Section	Description	Participant Comments
12.4 Applying the five-minute profile positive values to 15-minute and 30-minute metering data for a Profile Area	AGL queried AEMO as to how the determination required in 12.4 (ie whether to use the positive algorithm or negative algorithm) can be selected when applying the profile to the 15/30 min data. AEMO advised the decision is selected via the outcome of clause 12.3(d) which is not clearly specified, and therefore suggested that two new sub-clauses referencing 12.4 (a) and (b) be included.	Proposed new 12.3(e) Where the five-minute profile values determined in (d) are positive, the method to produce a five-minute representation of 15 and 30-minute metering data is described in 12.4. Proposed new 12.3(f) Where the five-minute profile values determined in (d) are negative, the method to produce a five-minute representation of 15 and 30-minute metering data is described in 12.5.
12.4 Applying the five-minute profile positive values to 15-minute and 30-minute metering data for a Profile Area	Edited to include the new Option 6 Load Profiling Methodology	Noted – bracketed reference requires 2 ')' – '(calculated in 12.3(d))'

Section	Description	Participant Comments
12.5. Converting 15-minute and 30-minute metering data for a Profile Area when five-minute profile values are negative – uniform allocation method	Addition of the new Option 6 Load Profiling Methodology	Consistency of description – eg 5-minute or five-minute For consistency across the document suggest that '5-minute'/'15-minute'/'30-minute' is used. In particular, 5-minute allows for easier identification of the 5-minute market reference in blocks of text. AGL is aware that numbers **on their own** below 10 are normally spelt out. However, it can be reasonably argued that the term '5-minute' is more appropriate given the market that is represented and the linkage between 5, 15 and 30.

4. MSATS – MDM Procedure

Section	Description	Participant Comments
3.2.3 Characteristics of the 5MLP	Addition of reference to section 12.5 Metrology Procedure: Part B	AGL supports the change
9.16 MDM-RM46	Update of description of the RM46 Report	AGL supports the change

5. MSATS Procedures: CATS Procedure Principles and Obligations

Section	Description	Participant Comments
4.12 Embedded Network Codes and Rules	Addition of: (iv) once all obligations have been met under the NER Chapter 5 and 5A and jurisdictional documentation, the LNSP must provide the Embedded Network Code to AEMO within five business days from the time it receives the request from the embedded network owner or the ENM acting on behalf of the embedded network owner, where the site is: (a) a Greenfield Site; (b) a Brownfield Site that for all intents and purposes has been set up as an embedded network but all consumers were purchasing energy from the embedded network owner; and (c) a Brownfield Site that may require network infrastructure changes.	AGL supports the change
9.1.4 LNSP Requirements	Addition of House Number To Suffix in (e)	AGL supports the change

Section	Description	Participant Comments
9.2.4 ENM Requirements	Addition of House Number To Suffix in (e)	AGL supports the change
9.3.4 LNSP Requirements	Addition of House Number To Suffix in (f)	AGL supports the change
9.4.4 ENM Requirements	Addition of House Number To Suffix in (g)	AGL supports the change
12.2.4 LNSP Requirements (5001 only)	Addition of House Number To Suffix in (d)	AGL supports the change
12.2.4 ENM Requirements (5021 only)	Addition of House Number To Suffix in (c)	AGL supports the change
12.3.4 LNSP Requirements	Addition of House Number To Suffix in (d)	AGL supports the change
12.6.4 ENM Requirements	Addition of House Number To Suffix in (d)	AGL supports the change
15.1.4 AEMO Requirements	Addition of House Number To Suffix in (d)	AGL supports the change

Section	Description	Participant Comments
Table 16-C – NMI Standing Data Items and CATS Standing Data NMI Discovery Data Access Rules	Addition of HouseNumToSuffix	AGL supports the change

6. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs

Section	Description	Participant Comments
4.1.4 LNSP Requirements	Addition of House Number To Suffix in (e)	AGL supports the change
4.2.4 ENM Requirements	Addition of House Number To Suffix in (e)	AGL supports the change
4.3.4 LNSP Requirements	Addition of House Number To Suffix in (f)	AGL supports the change
7.1.4 LNSP Requirements	Addition of House Number To Suffix in (d)	AGL supports the change
7.1.5 ENM Requirements (5021 only)	Addition of House Number To Suffix in (d)	AGL supports the change
7.2.3 LNSP Requirements	Addition of House Number To Suffix in (d)	AGL supports the change
7.4.4 ENM Requirements	Addition of House Number To Suffix in (d)	AGL supports the change
9.1.4 AEMO Requirements	Addition of House Number To Suffix in (b)	AGL supports the change

7. Standing Data for MSATS

Section	Description	Participant Comments
Table 12 CATS_NMI_DATA – Field Definitions	Addition of Data Element Name HouseNumberToSuffix	AGL supports the change
Table 13 CATS_NMI_Data	Addition of House Number To Suffix	AGL supports the change
Table 14 CATS_NMI_Data Field value examples	Addition of HouseNumberToSuffix	AGL supports the change

8. Retail Electricity Market Procedures – Glossary and Framework

Section	Description	Participant Comments
5. Glossary	Addition of the definition of LCCD	AGL supports the change