

LOAD PROFILING METHODOLOGY CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE
TEMPLATE

Participant: Red Energy and Lumo Energy

Submission Date: 20/01/2023

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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
<p>Do you agree with AEMO’s proposed implementation date of 1 October 2023? If not, why?</p>	<p>Red Energy and Lumo Energy (Red and Lumo) support the date of October 2023, and would not support an earlier date. There are some substantial regulatory changes and other initiatives already planned for 2023 - including Better Bills and Consumer Data Right. This new load profiling methodology will require changes and testing to be conducted, requiring resources and time to be allocated accordingly.</p> <p>Furthermore, to ensure October 2023 can be accommodated and in order to reduce the impact on change management, Red and Lumo request for AEMO to provide the per-interval profile proportion. Red and Lumo currently receive the profiles in terms of volumes, and undertake a calculation to work out the proportion of the daily volume which should be distributed to each interval. Any change in profiling methodology requires each participant to spend development effort revising the calculation (or purchase system upgrades from a vendor). Given AEMO are likely to change profiling in future, we request AEMO provide the per-interval profile proportion in addition to the existing profile volume information - saving time and effort for all participants who undertake their own calculations. This reduces the need for participants to change their systems to calculate the proportion themselves, and gives AEMO more flexibility to make changes in the future while ensuring all participants can profile with correct distributions. This request is analogous to the UFEA factors which AEMO provides and can be applied by participants directly, in addition to the supporting UFE quantities that allow participants to verify the given UFEA factor if they wish to (but can still reach settlement without having to do the full calculation themselves).</p>

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	Edited to include the new Option 6 Load Profiling Methodology	Noted.
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	Noted.

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	Noted.
9.16 MDM-RM46	Update of description of the RM46 Report	Noted.