RETAIL PROCEDURES
(WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

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1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the retail Procedures (Wholesale Demand Response) consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

1. Issues Related to Consultation Subject Matter

Question - Issue	Participant Comments
Do you agree with the proposed changes to provide additional clarification to support 5MS? If not, please provide an explanation of why you do not support the proposed changes.	The proposed changes should assist. But as a lot of detail is yet to be developed, it seems that this process will need to continue.
Do you agree that the DRSP will need to know of planned outages?	AGL would expect that a DRSP would need to have knowledge of planned interruptions as soon as possible to ensure that their portfolio is managed appropriately.

Question - Issue	Participant Comments
Do you agree that a PIN is the best mechanism for advising the DRSP? Does it need to be modified? Is there a better alternative?	The PIN is one common mechanism which can be used by the retailers. The inclusion of DRSPs as recipients of PINs means that retailers would need to reconfigure their systems to send DRSPs PINS (assuming they were B2B enabled). If DRSPs are not required to be B2B enabled for PINs, then there will be an expenditure undertaken by all retailers to enable this feature, with potentially little use by DRSPs as recipients. Further, while AGL supports a process for provision of planned work, AGL notes that Network interruptions (which are likely to be greater in number than retailer interruptions) need to be included, as do metering issues. Given that some DRSPs may choose not to become B2B enabled, AGL is prepared to make a change that is industry wide, but AGL does not believe that it should be required to additional, manual or bespoke features to meet the information needs of various DRSPs.
Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?	From a retail perspective, the PIN would be the most consistent mechanism. DNSPs generally do not use PINs, so that may leave a DRSP with a gap in their knowledge of planned outages, or there would need to be a requirement for DNSPs to provide PINs.
Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?	Generally, those proposed changes make sense. However, there are other process changes (eg Meter fault exemption notices issued by AEMO) which should be reviewed. Depending on what level of meter data accuracy is required for a site to be included in a demand program event will drive the market requirements and the DRSPs obligations. This also includes making the DRSP a party to meter data substitutions. The DRSP inclusion may not be warranted, if the need for substitutions removes the NMI from a WDR event.

Question - Issue	Participant Comments
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	In MSATS – yes.
Do you agree with the proposed changes to the B2B Guide? If not, please provide an explanation of why you do not support the proposed changes.	At this time the retail workshop for WDR did not cover B2B Service Orders, meter faults and MC obligations, therefore there may be unconsidered gaps in the proposals. It seemed evident from the workshop on Nov 6, that the introduction of the DRSP has more implications than have been currently discussed.
Do you agree with the proposed changes to the B2B Participant Process? If not, please provide an explanation of why you do not support the proposed changes.	The changes as outlines so far seem reasonable. However, changes to the Metrology Procedures need further discussion.
Are there any other changes to the B2B Guide that need to be made to support WDR?	This will depend on further developments.
Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	The proposed changes to the Metrology Procedures need underpinning information. It may be unnecessary for DRSPs to be a party to substitution agreements, if those meter data segments are not part of a DRSP's settlement, in which case, only the affected parties should be involved.

2. MSATS Procedures: CATS

Section - CATS	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	Noted.
2.10(h)	AEMO to Populate MSATS with the DRSP for the appropriate NMIs where the loads have been classified as wholesale demand response units.	Noted.
6.1.8	Inclusion of DRSP role in notification of change.	Noted.
6.2.8	Inclusion of DRSP role in notification of change.	Noted
10.1.7	Inclusion of DRSP role in notification of change.	Noted.
10.2.7	Inclusion of DRSP role in notification of change.	Noted.
10.3.7	Inclusion of DRSP role in notification of change.	Noted.
10.4.8	Inclusion of DRSP role in notification of change.	Noted.

Section - CATS	Description	Participant Comments
10.5.8	Inclusion of DRSP role in notification of change.	Noted.
10.6.7	Inclusion of DRSP role in notification of change.	Noted – but is this relevant to the DRSP ?
11.1.7	Inclusion of DRSP role in notification of change.	Noted.
11.2.7	Inclusion of DRSP role in notification of change.	Noted.
11.3.7	Inclusion of DRSP role in notification of change.	Noted.
12.3.7	Inclusion of DRSP role in notification of change.	Noted.
12.4.7	Inclusion of DRSP role in notification of change.	Noted.
12.5.7	Inclusion of DRSP role in notification of change.	Noted.
12.6.7	Inclusion of DRSP role in notification of change.	Noted.
13.1.7	Inclusion of DRSP role in notification of change.	Noted.

Section - CATS	Description	Participant Comments
13.2.8	Inclusion of DRSP role in notification of change.	Noted.
13.3.7	Inclusion of DRSP role in notification of change.	Noted.
13.4.7	Inclusion of DRSP role in notification of change.	Noted.
13.5.7	Inclusion of DRSP role in notification of change.	Noted.
13.6.7	Inclusion of DRSP role in notification of change.	Noted.
13.7.8	Inclusion of DRSP role in notification of change.	Noted.
13.8.9	Inclusion of DRSP role in notification of change.	Noted.
14.1.5	Inclusion of DRSP role in notification of change.	Noted.
14.2.5	Inclusion of DRSP role in notification of change.	Noted.
15.1.4(d)	AEMO to populate fields.	Noted.

Section - CATS	Description	Participant Comments
15.1.7	Inclusion of DRSP role in notification of change.	Noted.
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	Noted. Although we also note that the DRSP is not included in: • Previous Read Dates • Previous Read Quality Flag

3. MSATS Procedures: WIGS

Section - WIGS	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures.	Noted.
2.1.8	Inclusion of DRSP role in notification of change.	Noted.
2.2.8	Inclusion of DRSP role in notification of change.	Noted.
5.2.7	Inclusion of DRSP role in notification of change.	Noted.
5.3.7	Inclusion of DRSP role in notification of change.	Noted.
5.4.7	Inclusion of DRSP role in notification of change	Noted.
5.5.7	Inclusion of DRSP role in notification of change.	Noted.
6.1.7	Inclusion of DRSP role in notification of change.	Noted.

Section - WIGS	Description	Participant Comments
6.2.7	Inclusion of DRSP role in notification of change.	Noted.
6.3.7	Inclusion of DRSP role in notification of change.	Noted.
7.2.6	Inclusion of DRSP role in notification of change.	Noted.
7.3.7	Inclusion of DRSP role in notification of change.	Noted.
7.4.7	Inclusion of DRSP role in notification of change.	Noted.
8.1.7	Inclusion of DRSP role in notification of change.	Noted.
8.2.9	Inclusion of DRSP role in notification of change.	Noted.
8.3.7	Inclusion of DRSP role in notification of change.	Noted.
8.4.7	Inclusion of DRSP role in notification of change.	Noted.
8.5.7	Inclusion of DRSP role in notification of change.	Noted.

Section - WIGS	Description	Participant Comments
8.6.7	Inclusion of DRSP role in notification of change.	Noted.
8.7.8	Inclusion of DRSP role in notification of change.	Noted.
9.1.4	AEMO to populate fields.	Noted.
9.1.7	Inclusion of DRSP role in notification of change.	Noted.
10.1.5	Inclusion of DRSP role in notification of change.	Noted.
10.2.5	Inclusion of DRSP role in notification of change.	Noted.

4. Metrology Procedure: Part B

Section – Met B	Description	Participant Comments
	General Comment	If criteria are applied to which day/trading intervals are available for WDR settlements, then the agreement of the DRSP role in a number of metrology processes (Cl 3.2, 3.3) may not be necessary.
2.2(j)	Inclusion of DRSP role.	Noted. Although the value of this change may be dependent on whether or not interval data with substitutions affects either the baseline or DRSP payment. If the use of substitution only affects the DB and retailer, and not the DRSP, then there seems no reason for the DRSP to need to be a party to the agreement of a substitution.
2.2(n)	Insertion of the words "as required or".	Agree. AGL assumes that this change is a result of Faster Switching, not WDR.
3.2(g)	Inclusion of DRSP role.	Agree
3.2(h)	Inclusion of DRSP role.	Agree
3.3.6	Inclusion of DRSP role.	Agree
3.3.8	Inclusion of DRSP role.	Noted

Section – Met B	Description	Participant Comments
Cl 5.3.7	Customer Reading	As the use of a Type 67 Customer Reading has been included by AEMO in cl 14.2.1 and 14.3, AGL suggest that a type 67 substitution can only be made where a customer has provided a valid meter reading, as experience has shown that customer readings can be substantially incorrect. Amend cl 5.3.7 to ensure that for customer transfers only a validated meter reading may be used: '…. directly based on a validated Meter Reading…'
14.1	Deletion of 'Jurisdiction" and replaced with "retailer".	Noted
14.2.1	Inclusion of the words "or End User transfer,".	Agree
14.2.2	Inclusion of the words "or End User transfer,".	Agree
14.2.2(b)	New clause "Utilise a reason code of '67' for End User transfers,".	See issue regarding validated meter reading associated with cl 5.3.7. For non-transfer situations, the impact of an invalid customer reading is substantially lower than for a transfer.
14.3(g)	Addition of the reason code 67.	Agree

5. Glossary and Framework

Section - Glossary	Description	Participant Comments
Glossary	Addition of the description of DRSP.	Agree.
Glossary	Typo - Definition – Transaction Type Code –	There is a comma at the start of the definition which should be removed.

6. B2B Guide

Section – B2B Guide	Description	Participant Comments
5.1	Inclusion of the DRSP role in the B2B transactions and Participants table.	Noted.
Table 1	Inclusion of DRSP role as an initiator for PMD Meter Data Process.	Noted.
Table 1	Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Noted.
Table 1	Inclusion of DRSP role as a recipient of Meter Data Notification.	Noted.
6.6.1(a)	Inclusion of the DRSP role.	Noted.
6.6.2(a)	Inclusion of the DRSP role.	Noted.

7. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section – B2B Hub	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	Noted.
2.5	Grammar	Comma needed after '…Appendix A and,' and after '..Appendix C'. Upon completion and submission of the application forms referred to in Appendix A **and, for T**hird Party B2B Participants <u>the</u> completion of the checklist and associated documentation in **Appendix C, to** AEMO's satisfaction, AEMO will grant an applicant access to pre-production for the purposes of assessing an applicant's ability to fulfil messaging requirements. However, consideration should be given to re-writing the clause to improve clarity; eg: In order for AEMO to grant access to pre-production environments for the purposes of assessing an applicant's ability to fulfil messaging requirements, the following must be completed to AEMO's satisfaction: (i) *B2B Participants* must complete and submit the application forms in Appendix A; and (ii) *Third Party B2B Participants* must complete the checklist and associated documentation in Appendix C.
Appendix A	Check network options –	Is it only a Telstra BDSL only, or are there NBN options now available ?

Section – B2B Hub	Description	Participant Comments
Appendix B, table 1	SO – Metering Service Works	AGL notes the B2B SOs nominated but seeks clarity on how a DRSP might manage the installation or reconfiguration of enhanced metering for an aggregated contracted site as there may be differences of opinion as to whether the customer can change the metering (eg request a meter upgrade or reconfiguration).
Appendix B, table 1	OWN – Planned Interruption Notice	AGL also notes that a DRSP is not considered a recipient of a OneWayNotification for planned Interruptions, and would suggest that this function is relevant to a DRSPs ability to manage their customer load bidding if the PIN is to be used.
Appendix B, table 1	OWN – Notified Party	Should a DRSP have notice of a Disconnection / Reconnection Service Order ?
Appendix B, table 1	OWN – Meter Faulty	Should a DRSP have notice of a meter fault, as this will impact their ability to use that customer for a DRSP bid ? Should the DRSP be a recipient of the AEMO Meter Exemption where they are a registered Participant as this would be expected to meas that that site needed to be paused from their portfolio until the site metering was rectified.
Appendix B, table 1	Inclusion of DRSP role as an initiator for ProvideMeterDataRequest.	Noted
Appendix B, table 1	Inclusion of DRSP role as a recipient of ProvideMeterDataResponse.	Noted
Appendix B, table 1	Inclusion of DRSP role as an initiator for VerifyMeterDataRequest.	Noted

Section – B2B Hub	Description	Participant Comments
Appendix B, table 1	Inclusion of DRSP role as a recipient of VerifyMeterDataResponse.	Noted
Appendix B, table 1	Inclusion of DRSP role as a recipient of MeterDataNotification.	Noted

Other Matters

Meter Data Quality Criteria for WDR

AGL notes that various meter data quality criteria have been established for Faster Switching. As such, AGL seeks clarity on the meter data quality criteria which would be applied to the WDR process. For instance, would there be trading periods or days, where a WDR load cannot be considered for settlement purposes due to poor quality metering data, and what criteria would be applied to the data to include or exclude a day from a WDR settlement ?.

For example, if meter data is substituted, then how many TIs can be substituted (and surrounding TI periods for an event) should be excluded from WDR settlements.