

RETAIL ELECTRICITY MARKET PROCEDURES October 2021 CONSULTATION

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

Submission Date: *21 December 2021*

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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 Retail Electricity Market Procedures October 2021 consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

2. Questions on proposed changes

| Heading | Participant Comments |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| Does your organisation support the proposals contained in the Issues Paper? If not, please specify areas in which your organisation disputes AEMO's assessment (include ICF reference number) of the proposal and include information that supports your rationale why you do not support AEMO's assessment. | |
| Are there better options to accommodate the change proposals that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented? | |
| What are the main challenges in adopting these proposed changes? How should these challenges be addressed? | |
| Do you have any further questions or comments in relation to the proposals described above? | |

| Heading | Participant Comments |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| <p>Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please include your feedback / suggestions. Please note that this feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process.</p> | |

3. Feedback on proposed amendments

| Document | Participant Comments |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)</p> | <p>AGL notes the proposed changes for the B2B Hub accreditation process and considers it should be suitable for third party B2B users, who are not registered participants.</p> <p>A lot of the information sought for B2B registration within the Appendices would already exist within the AEMO registration systems and be superfluous for an existing registered participant.</p> <p>AGL considers that registered participants should be included as potential or secondary B2B participants. AGL notes the AEMO response regarding DRSPs not being specifically identified as a B2B user within the NER, which in turn requires them to seek agreement for any B2B transactions, is likely to place unnecessary competitive barriers on the operation of that registered participant role.</p> <p>AGL suggests that this matter be made an ERCF topic with the view to survey both the retail and wholesale working groups to determine an industry position. If industry agrees, a rule change can then be raised to treat other registered participants as secondary B2B users who can certify and use B2B transactions without participant agreement. This will remove unnecessary industry barriers to registered participants.</p> <p>AGL would not expect them to be represented on the IEC unless their usage grew substantially.</p> |

| Document | Participant Comments |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications) | AGL Notes AEMO's comments and has raised a Change Request to commence a review of the NMI classifications. |
| Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code) | AGL supports this proposed change. |
| Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044) | AGL supports this proposed change. |
| Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard) | AGL supports these proposed changes. |

4. Feedback on consolidations

| Document | Version(s) | Clause | Participant Comments |
|--------------------------------------|------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CATS | | | AGL supports the consolidations, although notes the comments provided in the minor consultation – see bottom of this response. |
| WIGS | | | AGL supports the consolidation. |
| Metrology Part A | | | AGL Notes the consolidations. AGL also notes that there is no v7.2 release. AGL suggests that the version table be updated for future reference to reflect that no v7.2 was developed or released. |
| Metrology Part B | | | AGL notes the inclusion of v7.2 amendments and supports the consolidations. |
| MSATS Procedures: MDM Procedures | | | AGL supports the consolidation. |
| NEM RoLR Processes Part A and Part B | | | AGL supports the consolidation. |
| (Glossary and Framework | | | AGL supports the consolidation. |
| Standing Data document | | | AGL supports the consolidation. |

5. MDFF NEM12 & NEM13

| Section | Description | Participant Comments |
|---------|-------------|------------------------------------------------------------------------------------------------------------------------|
| various | | AGL supports the initial changes and also supports the proposed additions following the initial round of consultation. |

6. B2B E-Hub Participant Accreditation and Revocation Process

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| | | Note comments above. |

7. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

| Section | Description | Participant Comments |
|---------|-------------|----------------------|
| | | Note comments above. |

8. Standing Data document

| Section | Description | Participant Comments |
|---------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.2 | Affected NMIs | <p>Noting that this describes all connection points, AGL suggests that the information could be broken into like / similar groups for increased clarity, such as:</p> <ul style="list-style-type: none"> • Transmission Network connecting to: <ul style="list-style-type: none"> ○ Other transmission networks; ○ Distribution Networks (ie Bulk Supply Point); ○ Customer supply point (1e wholesale connection point); • Distribution Network connecting to: <ul style="list-style-type: none"> ○ Other Distribution Networks (excluding embedded networks); ○ All connection points associated with a generating unit.... ○ All connection points with non-registered... ○ All market and Type 7 loads; ○ All non-contestable unmetered loads; • Sample meters as required • All child connection points. <p>..... etc</p> |

9. MSATS Procedures: MSATS Procedures: CATS

| Section | Description | Participant Comments |
|---------|-------------|-----------------------------------------------------|
| | | Note comments below provided in Minor consultation. |

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

| Section | Description | Participant Comments |
|---------|-------------|---------------------------|
| | | AGL Supports the changes. |

11. Metrology Procedure: Part B - National Electricity Market (Metrology Procedure: Part B)

| Section | Description | Participant Comments |
|---------|-------------|---------------------------|
| | | AGL Supports the changes. |

12. MSATS Procedures: (Meter Data Management) MDM Procedures

| Section | Description | Participant Comments |
|---------|-------------|---------------------------|
| | | AGL Supports the changes. |

13. NEM RoLR Processes Part A and Part B

| Section | Description | Participant Comments |
|---------|-------------|---------------------------|
| | | AGL Supports the changes. |

14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

| Section | Description | Participant Comments |
|---------|-------------|----------------------------------------------------|
| | | AGL supports the changes including the amendments. |

Metrology Procedure – Part A v7.4

| Section | Description | Participant Comments |
|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| 14 (a), 14(b) | <p>The final Rule made by the AEMC requires DNSPs to record and MCs and FRMPs to notify DNSPs of a Shred Fuse arrangement when they become aware of that arrangement.</p> <p>The drafting in the Metrology Procedure does not specify that, but rather specifies that the DNSPs must record those arrangements and that MCs and FRMPs must notify the DNSP of any new or existing Shared Fuse arrangements.</p> <p>Removing the words ‘becoming aware’ changes the obligation from one of advise when identified to an obligation to actively review each connections, which is substantially different to the Rule obligation.</p> | <p>Insert the phrase ‘when they become aware’ into clauses 14(a) and 14(b).</p> |
| 14(c) | <p>Noting the discussions held within the B2B Working group on the provision of shared fuse information to the DNSP, it is suggested that this clause be extended to include the MPB (current or pending) to allow for parties contracted to the MC to undertake this information provision.</p> | <p>Suggested addition:</p> <p>.....MC or the FRMP <u>and may notify the DNSP</u> of any...</p> |

CATS – v5.01

| Section | Description | Participant Comments |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.2(r),(s) | <p>Clauses (r) and (s) place obligations on the FRMP to notify the LNSP of any shared fuse arrangements, however, do not contemplate the FRMP arrangements and obligations of the MC to undertake the same notification.</p> <p>The drafting as it stands would see both the MC and the FRMP notify the LNSP of the same shared fuse arrangement.</p> | <p>Propose that for these clauses, that the FRMP obligation be amended to ‘notify, or ensure that the LNSP is notified, ..’</p> <p>To allow for arrangements between the FRMP and MC to meet this obligation.</p> |
| 2.5 (k), (l) | <p>Noting that the Metering Provider is an agent of the MC, the obligations to notify the MC can be extended to the MPB (current or pending) to notify the LNSP on behalf of the MC to meet the MC obligations.</p> | |
| 2.6 (k),(l) | <p>Clauses (r) and (s) place obligations on the FRMP to notify the LNSP of any shared fuse arrangements, however, do not contemplate the MC arrangements with MPBs who may undertake the same notification.</p> | <p>Propose that for these clauses, that the MC obligation be amended to ‘notify, or ensure that the LNSP is notified, ..’</p> <p>to allow for arrangements between the MC and MPB (current or pending) to meet this obligation.</p> |