

STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

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Table of Contents

- 1. Context 3
- 2. Questions..... **Error! Bookmark not defined.**
- 3. Other Issues Related to Consultation Subject Matter..... 11

1. Context

This template is to assist stakeholders in giving feedback about the options detailed in the issues paper associated with the Standalone Power Systems consultation.

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

2. Procedure Drafting Changes

General Comment

The inclusion of various format changes (ie converting uppercase to lower case in titles etc, added a layer of complexity to the review of these documents, which could have been left to an off cycle change where there was no material impact.

Metrology Procedure Part A

Section	Description	Participant Comments
4.1.2	Completion Timeframes - Corrected table reference	noted
4.2	Table 1 - Corrected table reference	noted
8(b)	Inclusion of test for clarification	<p>AGL notes that this seems to be a new item introduced at the second stage of this consultation, but which is not related to a SAPS process, nor identified in the Draft Report.</p> <p>AGL is also unaware of any discussion at industry regarding this proposed change.</p> <p>As such, AGL does not support this change as it</p> <ol style="list-style-type: none"> 1. Has not been discussed; 2. Has nothing to do with a SAPS; and 3. Was not covered off in either the initial or Draft report.
12.4(a)(iii)	New clause to include connection points in a SAPS	<p>Noted – but it is unclear why this clause is needed, as any generating unit connected post Dec 2018 must have a 5ms interval meter and said data must be provided to AEMO for settlement purposes, especially post Oct 2021.</p> <p>If this clause is required, then does this mean there are gaps for other grid connected generating units ?</p>
12.6	Corrected table references	Noted

Metrology Procedures Part B

Section	Description	Participant Comments
15.1	New section, calculation of SAPS generation	<p>AGL notes the proposed process for calculation and apportionment of SAPS generation is based on summing the end user consumption and then applying the aggregated TI Load to the market generation.</p> <p>As such, AGL is unclear why there would be no metering data for some of the SAPS generation, barring some sort of data recording / collection failure, in which case it would be expected that substituted meter data would be provided.</p> <p>AGL understands that this apportionment to the SAPS generation is to ensure that the Rule requirement that DLF losses and UFE do not occur within a SAPS environment.</p> <p>However, AGL does have concerns with this methodology, when applied to accumulation meters. No process will provide a close estimation of an accumulated meter consumption, particularly in a closed environment with a sample of accumulated energy consumption ranging from perhaps 1 to 3 sites.</p> <p>AGL does not consider that the aggregation of consumption where there are accumulation meters will work effectively in such an environment and may lead to unreasonable financial outcomes for the SAPS Generation FRMP.</p> <p>Where there are accumulation meters in a SAPS environment, an estimate of their consumption is the remaining generation after any other interval metered consumption has been removed, rather than apportioning generation based on accumulation meter data, and as such, would not include DLF or UFE.</p>

Section	Description	Participant Comments
15.2	New section, conversion of non 5-minute interval data on a SAPS	<p>The proposed profiling is a basic divide by 6 or divide by 3 process, but AGL does not consider this adequate as it stands. A working group review of the NEM 30/15 profiling processes is underway, with an expectation that the profiling mechanism will be adjusted following consultation.</p> <p>As such, AGL suggests that this section either be deleted or just referred back to CI 12, which details the process for profiling 30/15 interval data to 5ms interval data.</p>

Section	Description	Participant Comments
15.3	New section, conversion of accumulation metering data on a SAPS	<p>AGL considers that the proposed energy calculation needs more clarity in the processes to be used. A SAPS system is a closed energy system; which means that energy consumed must equal energy generated, that is, the net energy must equal zero within a SAPS.</p> <p>A SAPS system may have a mix of metering within the system: 5ms interval, 30/15 ms interval and accumulation.</p> <p>Wholesale settlements is undertaken fortnightly. Under normal metering arrangements, any remotely read interval metering data should be available each day; however, accumulation metering data will not be available until perhaps 3 months later.</p> <p>Since a SAPS environment must net to zero, then every Trading Interval would look like:</p> $\Sigma(\text{generation})\text{TI} = \Sigma(\text{interval Data})\text{TI} + \Sigma(\text{accumulation Data})$ <p>Or, to put it another way, any accumulation consumption is what is remaining after the interval data has been removed from the generation data for each TI.</p> <p>In order to balance the SAPS generation and consumption, the accumulation data should be initially calculated as the remaining quantity (per TI) after the interval consumption is subtracted from the interval generation. If there are multiple accumulation meters, then some sort of further split should be made of the accumulation streams between any accumulation meters, taking into account that some may be controlled load or have non-standard consumption cycles.</p> <p>As such, the proposed procedure for calculating the accumulation energy flow per TI as described in the procedure is not likely to work adequately, could lead to unexpected outcomes for the FRMP at the SAPS generation.</p>

MSATS National Metering Identifier

Section	Description	Participant Comments
10	New section, TNI convention for grid connected TNIs	Noted
11	New section, TNI convention SAPS NMIs	Noted
12	New section, migration of grid connected NMIs to SAPS	Noted
13	New section, Migration of SAPS NMIs to Grid. Is this section required?	It would be worthwhile to consider the steps necessary to undertake a reversal, to determine whether there is an implication or process issue that may cause unintended consequences, noting that a SAPS implementation may be delayed or cancelled, or as small SAPS system may grow to a much larger environment requiring / allowing a grid connection.

SLP MDP Services

Section	Description	Participant Comments
3.9	Changed header to include SAPS	<p>Cannot identify change described in this consultation - apart from changes of Uppercase to Lowercase</p> <div style="border: 1px solid black; padding: 10px;"> <p>3.9. Specific <u>m</u>Metering <u>d</u>Data <u>p</u>Processing <u>r</u>Requirements for Special Sites</p> <p>Subject to an MDP’s level of accreditation and system capability to manage <i>interconnectors</i>, <i>transmission connection points</i>, <i>generation connection points</i> and cross boundary/border supply points between <i>distribution networks</i> or <i>Local Retailer</i> regions, each MDP must:</p> <ul style="list-style-type: none"> (a) perform <i>transformer</i> or line loss compensation algorithms, or both, to compensate for losses between the <i>metering point</i> and the <i>connection point</i>; (b) perform calculations of Datastreams for the requirements of each Special Site; (c) perform nodal <i>check metering data</i> Validation and Substitution; (d) undertake SCADA data Validation and Substitution for <i>generation connection points</i>; (e) manage logical <i>meters</i> and nested logical <i>metering data</i> calculations; (f) handle threshold test variances to equations such as the use of ‘If Then Else’ statements; and (g) any combination of the above. <p>Each MDP must ensure that any algorithm in support of a logical <i>NMI</i> is accepted by the MC, AEMO, FRMP and LNSP before being used.</p> </div>
7.4	Change “significant” to “material”	noted

SLP MP services

Section	Description	Participant Comments
6.4 (d)	Change “significant” to “material” to align with SLP MDP services	Noted
6.4 (e)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Noted
6.4 (f)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Noted

3. Other Issues Related to Consultation Subject Matter

Participant Comments