



21 September 2022

Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email to nem.retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Energy Queensland submission to Identifying a SAPS NMI in MSATS - Second Draft Report and Determination

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its second draft report and Determination for Identifying a SAPS NMI in MSATS.

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Energy Queensland's comments on the proposed amendments to the various procedure documents are included in the attached AEMO response template.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Laura Males on 0429 954 346.

Yours sincerely,

A handwritten signature in blue ink that reads "Alena Christmas".

Alena Christmas
Acting Manager Regulation

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Encl: *Energy Queensland comments on proposed procedure amendments*

STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: *Energy Queensland*

Submission Date: *21 September 2022*

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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

Metrology Procedure Part A

Section	Description	Participant Comments
4.1.2	Completion Timeframes - Corrected table reference	Energy Queensland has no comment
4.2	Table 1 - Corrected table reference	Energy Queensland has no comment
8(b)	Inclusion of test for clarification	Energy Queensland has no comment
12.4(a)(iii)	New clause to include connection points in a SAPS	Energy Queensland has no comment
12.6	Corrected table references	Energy Queensland has no comment

Metrology Procedures Part B

Section	Description	Participant Comments
15.1	New section, calculation of SAPS generation	Energy Queensland has no comment
15.2	New section, conversion of non 5 minute interval data on a SAPS	Energy Queensland has no comment
15.3	New section, conversion of accumulation metering data on a SAPS	Energy Queensland is of the view that calculation methods used should identify that the methodology is applied to actual reads and MDP provided forward estimates.

MSATS National Metering Identifier

Section	Description	Participant Comments
10	New section, TNI convention for grid connected TNIs	Energy Queensland has no comment
11	New section, TNI convention SAPS NMIs	Energy Queensland supports the naming convention for SAPS TNIs
12	New section, migration of grid connected NMIs to SAPS	Energy Queensland suggests market notifications advising of the intention to connect an existing customer to a DNSP-led SAPS should be sent by the DNSP to AEMO and the FRMP so that the FRMP can appropriately assess impacts to any load variations.
13	New section, Migration of SAPS NMIs to Grid. Is this section required?	Energy Queensland has no comment

SLP MDP Services

Section	Description	Participant Comments
3.9	Changed header to include SAPS	Energy Queensland suggests there is an opportunity to expand the conditions relevant to the definition of special sites to include SAPS.
7.4	Change “significant” to “material”	Energy Queensland has no comment

SLP MP services

Section	Description	Participant Comments
6.4 (d)	Change “significant” to “material” to align with SLP MDP services	Energy Queensland has no comment
6.4 (e)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Energy Queensland supports the proposed changes to s 6.4(e) of the Service Level Procedure for Metering Provider Services.
6.4 (f)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Energy Queensland supports the proposed changes to s 6.4(f) of the Service Level Procedure for Metering Provider Services.

3. Other Issues Related to Consultation Subject Matter

Participant Comments

Energy Queensland suggests the inclusion of the SAPS settlement process, such as the administered pricing and calculation methods for type 6 metering, should be published under a new section of the NEM Settlements Process¹.

Further, Energy Queensland recommends the NEM Settlements Process be reviewed and expanded to provide additional information, similar to version 8 of the WEM Procedure: Settlements.

¹ https://www.aemo.com.au/-/media/files/electricity/nem/settlements_and_payments/prudentials/nem-settlement-process.pdf