

STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE

Participant: PLUS ES

Submission Date: 20/09/2022

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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	
4.2	Table 1 - Corrected table reference	
8(b)	Inclusion of test for clarification	<p>PLUS ES recommends that this amendment should be removed from this consultation and if deemed required, included in a future consultation, as:</p> <ul style="list-style-type: none"> • This change was introduced in the 2nd stage of the consultation • It could be deemed a 'material' change if participants are using a testing methodology other than 'inspection by attributes' • Not identified in the Draft Report and Determination paper of the consultation and had the potential to be missed.

		<p>Supporting industry transparency, PLUS ES proposes:</p> <ul style="list-style-type: none">• Increased visibility: All changes should be identified in the Issue Paper/draft determinations of each consultation, not only in document mark ups• Non editorial changes to be allowed a full consultation cycle – not included mid cycle, especially when the changes are not related to the main topic of the consultation. That is the industry allowed sufficient consultation timeframes and feedback opportunities to apply due diligence to proposed changes and E2E impacts analysis. <p>Additionally, PLUS ES does not support the inclusion which constrains the testing methodology to the ‘inspection by attributes’ method, due to the following reasoning:</p> <p>Allowing <u>only</u> attributes for sample accuracy testing means it <u>excludes the opportunity</u> to do sample testing by variables, as detailed in AS1284.13. Testing by attributes requires higher quantities of testing in the field – as high as four times as much testing (and resulting in four times as many costs and customer inconvenience for supply interruptions) - even though the statistical result is the same.</p> <p>AS1284.13 already considers when inspection by variables can be applied - sample test results must be statistically normally distributed - which protects against incorrect application of the method. When it cannot be applied, then inspection by attributes is used.</p> <p>And while the variables method that is referenced in 1284.13 is from a withdrawn/superseded Standard (AS2490-1997), successor standards (ISO3951.1/2/4) remain current. Since the same method is described and the</p>
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Metering Procedure Changes

		mathematics remain the same, it can be concluded that 'inspection by variables' is still valid.
12.4(a)(iii)	New clause to include connection points in a SAPS	
12.6	Corrected table references	

Metrology Procedures Part B

Section	Description	Participant Comments
15.1	New section, calculation of SAPS generation	
15.1(c)(i)		PLUS ES recommends that this clause should be reviewed and restructured/reworded as it is too long and complex to follow.
15.2	New section, conversion of non 5 minute interval data on a SAPS	Clause (a) – typo Replace semi-colon with a colon.
15.3	New section, conversion of accumulation metering data on a SAPS	

MSATS National Metering Identifier

Section	Description	Participant Comments
10	New section, TNI convention for grid connected TNIs	
11	New section, TNI convention SAPS NMIs	
12	New section, migration of grid connected NMIs to SAPS	<p>Clause (a)</p> <p>PLUS ES recommends that the condition ‘Where a DNSP has obtained approval to deploy a SAPS’ is clarified for completeness. That is, identify from whom the DNSP needs to get approval.</p>
		<p>Clause (a)(ii) & (a)(iv)</p> <p>For consistency, PLUS ES propose replacing ‘by five business days’ with ‘at least five business days’; as reflected in clause (a)(v).</p>
		<p>Clause (a)(iii)</p> <p>PLUS ES recommend the following:</p> <ul style="list-style-type: none"> • For efficiency, the wording ‘created in (ii)’ is removed as it is redundant. • For clarity, the clause should define ‘inactive’ as that is not a current NMI status code. For example, if the intent is to have them as a Greenfield status, then the clause to be reworded to state that.
		Clause (a)(vi)

Section	Description	Participant Comments
		<p>PLUS ES recommends for efficiency and consistency, this obligation is removed from the MSATS National Metering Identifier and included as a LNSP obligation in the CATS procedures, section 2.3</p> <p>One <i>assumes</i> the most efficient method of providing AEMO with confirmation of the actual SAPS operational date could be provided by updating the NMI status with applicable criteria.</p>
13	New section, Migration of SAPS NMIs to Grid. Is this section required?	

SLP MDP Services

Section	Description	Participant Comments
3.9	Changed header to include SAPS	PLUS ES believes this change has not been made in the MDP SLP.
7.4	Change “significant” to “material”	

SLP MP services

Section	Description	Participant Comments
6.4 (d)	Change “significant” to “material” to align with SLP MDP services	
6.4 (e)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	PLUS ES suggests for clarity and consistency, if there is an update in terminology from <i>significant</i> to <i>material</i> in clause 6.4 (d), extending that update in terminology to Clause 6.4(e).
6.4 (f)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	

3. Other Issues Related to Consultation Subject Matter

Participant Comments
Participant IDs - For industry efficiency, PLUS ES recommends that LNSPs wanting to act in the role of FRMP, for regulated SAPS, should have a separate Participant ID to that of their LNSP role.