

# STANDALONE POWER SYSTEMS

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Red Energy and Lumo Energy

***Submission Date:*** 21/09/2022

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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	Red Energy and Lumo Energy (Red and Lumo) note the proposed change.
4.2	Table 1 - Corrected table reference	Red and Lumo note the proposed change.
8(b)	Inclusion of test for clarification	Red and Lumo note the proposed change.
12.4(a)(iii)	New clause to include connection points in a SAPS	Red and Lumo note the proposed change.
12.6	Corrected table references	Red and Lumo note the proposed change.

**Metrology Procedures Part B**

Section	Description	Participant Comments
15.1	New section, calculation of SAPS generation	<p>AEMO proposes to aggregate every Trading Interval to determine the market generating unit's energy total using the following approach: <math>(\text{generation})_{\text{TI}} = (\text{interval Data})_{\text{TI}} + (\text{accumulation Data})</math>. It remains unclear how AEMO will account for UFE &amp; unmetered sites energy usage. Red and Lumo request that AEMO provide this information to participants and other interested parties for their consideration and feedback.</p> <p>AEMO proposes where no metering data is provided for any generating unit connected to the regulated SAPS, it will simply apportion energy equally to all generating units. However, for missing metering data, substitution data should be provided which can be reconciled by identifying the missing energy between: <math>(\text{total generation}) = (\text{interval}) + (\text{accumulation data})</math> which should net to zero.</p>
15.2	New section, conversion of non 5 minute interval data on a SAPS	<p>Red and Lumo do not deem the approach of converting 30 and 15 mins to 5 mins by dividing by 6 and 3 respectively as an efficient methodology. As AEMO would be aware, there is currently an ERCF sub-working group working with AEMO to review the process for profiling - taking into account spikes in energy use during a 30 mins interval.</p> <p>Red and Lumo strongly recommend for this clause (15.2) to refer back to the relevant clause in this procedure (clause 12). This will future proof the process, avoid AEMO needing to update the procedures in multiple places and prevent inconsistencies which may arise as the procedures are amended. This will also ensure a consistent approach is applied to consumers across the NEM, irrespective of where they receive their energy from.</p>

Section	Description	Participant Comments
15.3	New section, conversion of accumulation metering data on a SAPS	<p>Within a SAPS, the energy generated should equate the energy consumed - meaning both will net to zero. In no instance will there be a discrepancy between the two - whether that is additional consumption above what has been generated, and no generation not accounted for in consumption.</p> <p>Red and Lumo recommend that it may be more appropriate to take away the interval total from the generation total, and consider the left over total from the generation to be the accumulation total. Following a consistent approach as aligned in our commentary against clauses 15.1 and 15.2.</p>

**MSATS National Metering Identifier**

Section	Description	Participant Comments
10	New section, TNI convention for grid connected TNIs	Red and Lumo note the proposed change.
11	New section, TNI convention SAPS NMIs	Red and Lumo note the proposed change.
12	New section, migration of grid connected NMIs to SAPS	<p>Red and Lumo recommend AEMO consider and document what happens should there be a delay (temporary or long term) at any stage of this process.</p> <p>Further, AEMO must consider and propose a process for NMIs migrating away from a SAPS and back to grid connected.</p>

Section	Description	Participant Comments
Version Release History		Red and Lumo request for the 'Version Release History' to be moved to the top of the document for consistency with other procedure papers.

SLP MDP Services

Section	Description	Participant Comments
3.9	Changed header to include SAPS	Red and Lumo do not see the inclusion of SAPS in the header. Can AEMO please review?
7.4	Change "significant" to "material"	Red and Lumo note the proposed change.

SLP MP services

Section	Description	Participant Comments
6.4 (d)	Change "significant" to "material" to align with SLP MDP services	Red and Lumo note the proposed change.
6.4 (e)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Red and Lumo note the proposed change.

Section	Description	Participant Comments
6.4 (f)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Red and Lumo note the proposed change.

### 3. Other Issues Related to Consultation Subject Matter

Participant Comments
<p>Red and Lumo recommend AEMO differentiate between administrative changes and procedural changes in the marked up versions of procedural documents.</p> <p>The amended procedures contained a large volume of changes which we consider administrative in nature (i.e. decapitalisation of words in headers), which at times made it cumbersome to review the document for procedural changes. This can easily lead to a change having been missed, by either participants or AEMO - example as mentioned above for the SLP MDP Services, section 3.9 where the change in header to include SAPS does not actually exist. In these circumstances, it is prudent for AEMO to be more transparent and highlight non-administrative changes in the document through the use of technology, such as <b>highlighting</b> the substantive changes.</p>