

# STANDALONE POWER SYSTEMS

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant: Ausgrid***

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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. Questions

Section	Description	Participant Comments
4.1.3	Do participants agree with AEMO's assessment that MDPs for accumulation meters should provide interval data to the generator MDP and AEMO in a NEM12 file as outlined in option 2(a)?	<p>Ausgrid believes that neither option provides the best solution. The case for profiling the small amount of generation within a SAPS is not clear – as a likely MSRP Ausgrid does not see the need for profiled consumption data for the small amounts of revenue resulting from this process. There are significant cost implications for deployment of physical meters on SAPS to provide such data and potentially for system changes for other parties to undertake the profiling, which will ultimately be passed onto customers.</p> <p>Profiling is currently conducted by AEMO, who have systems in place to prepare these profiles. Ausgrid understands that the NERs indicate that a new accreditation to allow the MDP to do the profiling where required has been adopted, but this seems like an excessive expense for a small number of sites and particularly where AEMO already have this profiling capability.</p>

Section	Description	Participant Comments
		<p>2(a) will require all Type 6 MDPs to build to create NEM12 for these customer NMIs regardless of whether or not that are involved in SAPS processes and some Type 6 MDPs may not have the current capability to create NEM12 data.</p> <p>Whilst option 2(b) would be preferred from the proposed options, it requires that an MDP has elected to participate in the SAPS process and can build to create NEM12 for Basic data. For the small amount of sites an SAPS MDP would have it seems like a significant expense for changes which they may not adequately recover. However this option also alleviates the issue that the MDP for the Type 6 NMI will not have to create forward estimates and substitutions for Type 6 meters in a SAPS connection arrangements.</p> <p>As MDPs cannot be forced to conduct this work, it is unclear to Ausgrid if MDPs will be willing to obtain this accreditation, and what fallback mechanisms AEMO proposes in the instance that there are insufficient providers of these services due to excessive costs.</p>
4.1.3	Are there other advantages and disadvantages of the various options that AEMO should consider?	<p>Creating a data stream for the SAPS NMI using multiple customer NMIs with different meter types would be a complex arrangement (ie. BASIC, MRIM and COMMS4D).</p> <p>Ausgrid believes that in these circumstances with multiple customers and/or generators within the same SAPS, an actual meter on the SAPS NMI would be the easiest option and AEMO could adopt a simplified MDP accreditation as the metering data from the physical meter on the SAPS NMI would be used rather than a complex calculation from various customer metering NMIs.</p>

Section	Description	Participant Comments
4.1.3	Are there other options that AEMO should consider to resolve this matter?	<p>Ausgrid strongly encourages AEMO to re-consider the requirements for profiling what is a small amount of energy, not linked to market price fluctuations (i.e. a flat rate all year), and not proportional to the actual cost of energy in a SAPS as significant components will be supplied by renewable energy not from diesel operations. Our estimates suggest that the energy value per annum per SAPS based on current price and proposed formula is on average less than \$1,000.</p> <p>If a change is required to AEMO systems to facilitate a different payment approach for these customers, that should be strongly considered in light of the significant market costs (either systems or physical meter installations) that the profiling requirement will otherwise necessitate.</p> <p>AEMO could consider a mix of options that allow for a physical COMMS4 meter on the SAPS NMI in complex cases (subject to technical limitations on installation of meter). Installation of a COMMS4 meter on the SAPS NMI would solve a number of issues raised in this consultation paper for those cases.</p> <p>For simple (ie 1 customer) SAPS eliminating the profiling requirement altogether would be most efficient and proportional given the energy values involved and complications identified in this paper.</p>
4.2.2	Do participants agree that this convention is to be captured in a procedure?	<p>Ausgrid does not have any issues with AEMO's TNI proposal.</p> <p>Ausgrid would like to clarify this arrangement with AEMO. Is the purpose of having a specific TNI code for each SAPS so that the customer NMIs that are going to be used to calculate the metering data for the virtual meter on the</p>

Section	Description	Participant Comments
		SAPS NMI are linked together? However, if it was mandated that the SAPS NMI must have a physical metering installation then one TNI per network area could be used as the metering data from the physical meter on the SAPS NMI could be used for delivery to AEMO for settlement.
4.2.2	In which procedure or supporting document should it be included?	A new section on TNIs in the AEMO NMI procedure.
5	Has AEMO captured all the changes?	In August 2022, the new role of SAPS Resource Provider (SRP) will become a role under the NERs. In May 2023 the new role of Market SAPS resource Providers (MSRP) will become a new participant under the NERs. In the AEMC final determination both the SRP and MSRP have to register with with AEMO. Ausgrid notes in this draft determination that AEMO have will publish an application and guideline based on the current MSGA documents. Ausgrid would like AEMO to confirm if this application will cover both the SRP and MSRP registered participant roles.
5	In making the changes to the SLP and Metrology procedures, what are the issues that AEMO should keep in mind/consider?	

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

Participant Comments
If the network registers as an MSRP, the network can appoint them selves as the FRMP for the SAPS NMI. If the network chooses not to regiater as a MSRP and decide to appoint another party as the FRMP, being the SAPS NMI will have a NMI Classification of GENERATR, would

## Participant Comments

the participant have to be registered with AEMO as a Generator or can the network appoint a retailer registered as a Market Customer? Ausgrid believes it should be a registered generator, but is requesting clarification.

Ausgrid would like to confirm that the SAPS NMI allocation follows the following process:

- Network creates NMI;
- Network appoints FRMP;
- Depending on MIT customer (network) or FRMP will appoint the MC (see below comments)
- MC appoints MP and MDP.

For a Type 5 metering installation connected to the SAPS, does the MDP (either in option 2(a) or 2(b)) have to convert the 30 minute interval data to 5 minute data? Ausgrid assumes that this would be the total consumption from the 30 minute interval evenly split over each 5 minute interval. Will this requirement be documented in AEMO's procedures?

What Metering Installation Type will the SAPS NMI have if it is a virtual meter? This impacts how the MC is appointed. As there is no meter its should not be a Type 5 or 6 as AEMO is requesting 5 minute data and Type 5 and 6 cannot be installed anymore. NCONUML doesn't seem suitable as although there is no meter and these are based on a constant load not a variable load, which is what the customer NMIs would be. COMMS4D, whilst there is no meter, the MDP has systems to estimate and substitute 5 Min data. Again, if a meter is mandated for the SAPS NMI this alleviates this issue as it would have to be a Type 4 metering installation.

Ausgrid strongly encourages AEMO to condiser that a physical COMMS4 meter on the SAPS NMI should be the preferred option. Installation of a COMMS4 meter on the SAPS NMI would solve a number of issues raised in this consultation paper.