

# STANDALONE POWER SYSTEMS

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

*Participant: CitiPower Powercor*

*Submission Date: 2 June 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. 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>CitiPower Powercor disagrees with AEMO's assessment that MDPs for accumulation meters should supply interval data to the generator MDP and AEMO in the NEM12 format.</p> <p>CitiPower Powercor recommends option 1 be adopted to deal with this matter, particularly in Victoria. Of the two other options we would only support option 2b as it is consistent with the intent of the AEMC rule change in relation to NER chapter 7, particularly 7.10.2 (b1).</p> |
| 4.1.3   | Are there other advantages and disadvantages of the various options that AEMO should consider?  | <p>CitiPower Powercor is of the view that option 2a introduces unnecessary and significant costs for our IT systems which would be required to have capability to load profile and provide NEM12 data for type 6 meters. Type 6 meters make up less than 1% of our meter population and we have an active strategy to reduce this number further making the business case for this option very cost prohibitive.</p>  |

| Section | Description  | Participant Comments   |
|---------|--|--|
| 4.1.3   | Are there other options that AEMO should consider to resolve this matter?  | <p>CitiPower Powercor recommends that AEMO continues to load profile type 6 metering data for all settlements purposes, including SAPS, as part of its compliance with rule 3.21.</p> <p>Additionally, if option 2a remains the preferred option for AEMO and/or the industry it should not be introduced in Victoria and only be applicable in other jurisdictions.</p> |
| 4.2.2   | Do participants agree that this convention is to be captured in a procedure?   |  |
| 4.2.2   | In which procedure or supporting document should it be included?   |  |
| 5       | Has AEMO captured all the changes?   |  |
| 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 |
|----------------------|
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