

# STANDALONE POWER SYSTEMS

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

*Participant: SA Power Networks*

*Submission Date: 2 June 2022*

# Table of Contents

- 1. Context ..... 3
- 2. Questions..... 3
- 3. Other Issues Related to Consultation Subject Matter..... 6

## 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>SA Power Networks does not support Option 2(a) as recommended by AEMO.</p> <p>Our assessment of Option 2(a) is –</p> <ul style="list-style-type: none"> <li>• It is the most complex of the options and does not provide the expected level of accuracy required by the market.</li> <li>• Significant investment would be required to develop the internal system and process capability to produce interval data and provide this data to the MDP of the generator – this is likely to make the SAPS proposition cost prohibitive (noting that manual work arounds would not be sustainable if SAPS customers grow beyond a very small volume).</li> <li>• Establishing new requirements for the Distributors to make investment in metering capabilities does not make sense when the market rules are removing distributors from the metering roles (wasted investment and cost for customers).</li> </ul>

Section	Description	Participant Comments
		<ul style="list-style-type: none"> <li>• True interval data should be used to remove any scope for disputing the validity of the settlements process (basic meter data collection cycles are not likely to match settlement timing requirements. Where this is the case, it would add to the estimation requirements and potential accuracy gap).</li> <li>• In addition, SA Power Networks would require MDP accreditation to produce Type 1-4 interval data as we are currently only accredited as an MDP for Types 5, 6 and 7 therefore adding further cost and complexity. This would be the only process we would require such accreditation for as we are not required to produce Type 1-4 interval metering data for any other purpose at present.</li> </ul> <p>SA Power Networks recommends that Option 1 is the only sensible solution option that should be progressed because -</p> <ul style="list-style-type: none"> <li>• Option 1 would be the lowest overall costs to implement for industry and customers (when compared to our assessment of the system and process costs to build the capability for both Options 2a and 2b).</li> <li>• The distributor can factor the cost of metering (installation and ongoing costs) into the overall business case to determine if the planned SAPS is the lowest cost solution for customers.</li> <li>• The most simple and accurate option, particularly as the volume of customers within a SAPS increases.</li> <li>• This option does not require distributors to build capability in legacy metering systems that they are working towards retiring (particularly important if the volume of SAPS in a distribution area is low).</li> </ul>

Section	Description	Participant Comments
		Should Option 1 not proceed, then SA Power Networks believes that Option 2(b) is the only other viable option to be considered.
4.1.3	Are there other advantages and disadvantages of the various options that AEMO should consider?	Please refer to SA Power Networks feedback and response to question above.
4.1.3	Are there other options that AEMO should consider to resolve this matter?	No other option identified.
4.2.2	Do participants agree that this convention is to be captured in a procedure?	SA Power Networks agrees that the TNI convention for SAPS should be captured within a market Procedure.
4.2.2	In which procedure or supporting document should it be included?	SA Power Networks recommends that the NMI Allocation Procedures be considered.
5	Has AEMO captured all the changes?	At this point, SA Power Networks has not identified any further items.
5	In making the changes to the SLP and Metrology procedures, what are the issues that AEMO should keep in mind/consider?	SA Power Networks has no issues to highlight.

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

Participant Comments