

Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: *AGL*

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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 Integrated Energy Storage 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. Consultation questions

NMI Classification Code amendments

Question	Participant Comments
1. Do you agree that the proposed new NCCs address the requirements for compliance with the IESS Rule outlined by AEMO? If not, please specify your reasoning and any alternative options relevant to the IESS rule.	Generally AGL supports the changes to NMI Classification for IESS, but notes (below) that the drafting of NREG could potentially be improved and there is a question surrounding DIRS when associated with a small load.

<p>2. Are there any gaps or issues with the proposed NCC definitions as they relate to the IESS Rule, noting that issues beyond the scope of the IESS Rule will be dealt with through separate processes?</p>	<p>AGL considers that having the current drafting for NREG relying on the existence of a non-registered entity before any further tests are completed, is not a clear or definitive mechanism to allow a Distribution network to classify a connection as NREG.</p> <p>The initial sentence links a connection point associated with a person (defined as a <i>non-registered DER provider</i>) rather than an asset, which AGL considers would be very difficult for as Distribution Network to confirm.</p> <p>As the person is non-registered it is unclear how a connection point can be identified to meet the initial criteria. Therefore, AGL suggests that the initial statement should be:</p> <p style="text-align: center;"><u>Connection point associated with a stand-alone non-registered DER provider distribution connected unit at which:</u></p> <p>This provides clarity as it defines a connection point with an asset.</p> <p>Further, by changing the initial sentence the remaining limbs of the definition operate in a clearer manner:</p> <p>For limb 1, the criteria to identify a <i>non-registered DER provider</i> is no longer part of the definition and relies on the classification of the Small Resource Aggregator, without the interaction of a non-registered DER provider.</p> <p>For limb 1, without the proposed change, the distribution connected unit must have a non-registered person (difficult to identify) and be classified by a Small Resource Aggregator.</p> <p>For limb 2, the criteria to link a <i>non-registered DER provider</i> to a person who meets the requirements of NER 5.3.1A no longer apply, rather the criteria relate to an asset and a person who meets NER 5.3.1A or a non-registered DER provider who makes an election under clause 5A.A.2(c);</p>
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Question	Participant Comments
	<p>For limb 2, without the proposed change, a person who meets NER 5.3.1A(c)(2) is a person who has applied for an exemption etc or (3) a non-registered DER provider. Given these requirements, it seems incorrect to initially define these people as non-Registered DER providers.</p> <p>For limb 3, the definition flows more appropriately as it then becomes a Distribution Connected Unit with a <i>non-registered DER provider</i> who meets the requirements of NER clause 5A.A.2.</p> <p>DIRS definition</p> <p>Given the definition of a DIRS, relates to a non-registered DER provider who may install a generating unit greater than a micro generator, but may have a nominal load which would classify them as a <i>small</i> customer, AGL considers the DIRS definition may not supersede the regulatory protection obligations associated with a <i>small</i> customer, and as such, there may be a need to have a DIRS classification that can be used to identify a small customer (eg SDIRS) vs a large customer DIRS (eg LDIRS).</p>
<p>3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from AEMO to understand the impact of the proposed changes?</p>	<p>For the IESS NMI classifications there are system and process impacts to identify these connection points.</p>

Amendments to terminology

Question	Participant Comments
4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?	AGL has not identified any issues
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	<p>Given that IESS is an optional service for participants, the critical readiness is AEMO and AEMO systems, which means that readiness for the specific IESS changes per se are likely not critical.</p> <p>However, the impact on Settlements systems as a result of IESS is another matter. As the IESS change has required a change to all Participant Settlement systems AGL feels that AEMO should monitor and support Participant readiness, as Settlements is a core requirement of market operations.</p>

Other matters - ICF_070 Increase 'Building Name' Field Length in MSATS

Question	Participant Comments
<p>6. Do you agree with the proposed change to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document? If not, please specify your reasoning.</p>	<p>AGL supports this change.</p>

Other matters - ICF_059 CATS clarifications plus NMI Classification Review

Question	Participant Comments
<p>7. Do you agree that Option 1 would most effectively and efficiently resolve the issue of NEM Participants not being able to easily and accurately identify a customer's non-registered or non-classified generation capabilities? If no, please specify your reasoning.</p>	<p>As a proponent of Option 1, AGL is supportive of Option 1 and considers it the lowest cost outcome, especially when NMI classifications are being amended.</p> <p>AGL notes Options 2 and 3 may also have benefits and are worthy of further investigation however could result in significant costs and delays.</p> <p>AGL encourages the adoption of Option 1 as a first step to addressing the issue of NEM participants being able to accurately identify a customer's non-registered or non-classified generation capabilities.</p>

Question	Participant Comments
<p>8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.</p>	<p>As AGL was a proponent of these changes, AGL has no further proposals to support this outcome. AGL recognises the extended discussion regarding other processes (eg DER Register), but these processes are significantly more expensive and time consuming for no additional perceivable benefit at this time. AGL does, however, not consider this matter closed, but simply a step taken in the development and understanding of a two way market.</p> <p>AGL has not identified another, simple, low-cost alternative to the additional NMI classifications but would not be adverse to exploring further options to address the identified issues.</p>
<p>9. Do you agree that the creation of a new NCC to identify Standalone EV Charging Stations would add value to the market? If no, please specify your reasoning.</p>	<p>AGL supports this change, as EV charging stations by their very nature, are likely to be highly unpredictable in terms of both load and export characteristics.</p> <p>Given the likely bidirectional and dynamic nature of these connection points AGL believes that this additional NMI classification will significantly benefit the networks, the market and financial participants. As such, they need to be easily identified so they can be managed outside normal forecasting processes.</p>
<p>10. Do you agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS? If not, please specify your reasoning.</p>	<p>AGL proposed these minor editorial amendments to ensure consistent understanding and application across the NEM, and therefore supports these changes.</p>
<p>11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.</p>	<p>AGL proposes that the amended classifications should go live when the IESS Classifications go live, as this is the most efficient and lowest cost outcome for both AEMO and industry.</p>

3. Procedure Drafting Changes

Retail electricity market procedures – Glossary and Framework

Section	Description	Participant Comments
Figure 1	Modify diagram to represent bi-directional flows of energy instead of uni-directional flows	AGL supports this change
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	AGL supports this change
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	AGL supports this change
Glossary	<p>Remove the following terms:</p> <ul style="list-style-type: none"> • First Tier NMI • First Tier Load • Second Tier NMI • Second Tier Load • Tier 1 Site • Tier 2 Site <p>Include the following term:</p> <ul style="list-style-type: none"> • Financially Responsible <p>Add <i>Integrated Resource Provider</i> to the definition of FRMP</p>	AGL supports this change

MSATS CATS

Section	Description	Participant Comments
2.2 Financially responsible market participant	Part (d) Delete 'Ensure that only small generating unit connection points are assigned to the relevant MSGA' and replace with 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator' Delete sections (i) and (j) and replace with: 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'	AGL supports this change
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	AGL supports this change
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	AGL supports this change
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	AGL supports this change

Section	Description	Participant Comments
Table 4-H- Datastream Status Codes	Remove reference to second tier retailer Part (d) If a retailer transfer CR is Completed the Datastream Status Code must be 'A' when the NMI is energised.	AGL supports this change
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	AGL notes this comment and seeks clarity given the issue raised earlier in the response.
15.2.3 Requesting Participant Requirements	Remove the following field as a selection option from the BCT: The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	AGL supports this change

MSATS WIGS

New NCCs are proposed to be included in the Condition Precedent component of the Wholesale, Interconnector, Generator and Sample (WIGS) procedure. The existing system constraints are unchanged for each participant requirement, timeframe and objection for each change request submitted.

Change Request type	Section	Conditions Precedent	Participant Comment
Change Retailer	2.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	AGL supports this change
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	AGL supports this change
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	AGL supports this change
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	AGL supports this change
Create NMI, Metering Installation Details and NMI Datastream	4.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AGL supports this change
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AGL supports this change
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	AGL supports this change
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change

Change Request type	Section	Conditions Precedent	Participant Comment
Create and Maintain Datastream – Change Requests	6.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	AGL supports this change
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	AGL supports this change
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	AGL supports this change
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	AGL supports this change
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
Change MPB or MPC or Both	8.6.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AGL supports this change

Section	Description	Participant Comments
9.2.3	Remove the following field as a selection option from the BCT: The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	AGL supports this change

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	AGL supports this change
3.5	Remove reference to 'first tier load'	AGL supports this change
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	AGL supports this change
12.8.2	Remove reference to 'first tier controlled load' and 'second tier controlled load' and include market customer. In 12.8.2 Load Profiling (a) and remove first tier from 12.8.2 Load Profiling (b) and include market customer.	AGL supports this change

Metrology Procedure Part B

Section	Description	Participant Comments
10.3	<p>Bi-directional units may have multiple sources of generation and load behind the connection point. For sites that are scheduled units, AEMO provides SCADA data for generating units. Validation of metering data for connection points where SCADA is made available includes NCCs of DGENRATR and Small Resource Aggregator.</p> <p>New clause to reference bi-directional units where validation should occur for SCADA data suffixes of E and B channel data.</p>	AGL supports this change
12.3	<p>Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.</p>	AGL supports this change
13.1	<p>Change all references in section 13.1 from Market Load to Market Connection Point</p>	AGL supports this change
13.5	<p>Change reference from 'market load' to <i>market connection point</i></p>	AGL supports this change

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	AGL supports this change

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	AGL supports this change

Exemption Procedure Data Storage Requirements

Section	Description	Participant Comments
2.1	Remove reference to <i>transmission connection point</i> and <i>distribution connection point</i> where the FRMP is a <i>Market Generator</i> or <i>Market Small Generation Aggregator</i> to reflect the Rule Change 7.8.2(b1).	AGL supports this change

Guide to the Role of the Metering Coordinator

Section	Description	Participant Comments
4.1	Remove <i>small generating units and market generating units</i> and include <i>non-market bidirectional units and small resource connection point</i> .	AGL supports this change

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	AGL supports this change

Service Level Procedure: MDP Services

Section	Description	Participant Comments
3.13	Include new NCCs of XBOUNDRY, BULK, DGENRATR, DIRS and TIRS for connection points required to provide 90% of complete actual metering data by 8am for the day(s) specified for prudential purposes.	AGL supports this change

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	AGL supports this change

Metering Data Provision Procedures

Section	Description	Participant Comments
4.3	Include a new energy flow type that reflects the purpose of the rule change to include bidirectional energy flows for generation connection points.	AGL supports this change