

Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Origin

Submission Date: 30-March-2023

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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.	No issue
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?	No issue
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	The changes suggests amendment of existing SMALL and LARGE NCCs to exclude sites with generation $\geq 10\text{kVA}$ per phase, which appears to be an extensive and costly exercise.

<p>AEMO to understand the impact of the proposed changes?</p>	<p>In general, changes to existing classifications are difficult to manage so should be undertaken only when absolutely necessary. A clear approach to how participants are expected to transition this data is required in order to determine the impact.</p>
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Amendments to terminology

<p>Question</p>	<p>Participant Comments</p>
<p>4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?</p>	<p>No issues</p>
<p>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>	<p>Origin see no reason why a formal market readiness program would be required for this round of IESS changes.</p>

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

<p>Question</p>	<p>Participant Comments</p>
<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>No issues</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>The paper states that “NEM Participants are unable to easily and accurately identify a customer’s nonregistered or non-classified generation capabilities in the CATS system/procedures” however</p> <ul style="list-style-type: none"> • there is no clear definition of what “generation capabilities” that are required to be identified. • CER devices have many capabilities E.g. are they remotely connectable? Are they set to zero export? Generation capacity of the device, or of the system as whole? Is it PV or a wind generator or a diesel generator? • Without clear definition of what ‘capability’ NEM participants need to be exposed it is difficult to assess any proposed solution. <p>Based on the proposal, it appears generation capabilities mean the potential generation output. We would suggest that further work needs to be done to clearly define what this means.</p>
<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>We support Option 2 (DER) or Option 3. Use ADL (avg daily load) at data stream level.</p> <p>What is the problem that we are trying to resolve? The proposed change in option 1 represents an expensive and fundamental change to participant systems and it’s not clear what problem it would address.</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>There is value but we would need to give a classification of the min load required to be recorded.</p> <p>We would suggest this new code only applies to DC chargers, or a standalone charger rated greater than 32A AC or multiple chargers combined rating behind the same meter > 32A.</p>

	Not clear on the benefit of this NCC vs other behind the meter consumptions eg pools, heat pumps or indeed other devices like batteries.
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.	No Issue
11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	Grouping of related changes and holding to a regular schedule of implementation help participants greatly.

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	No issues
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	No issues
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	No issues
Glossary	Remove the following terms: <ul style="list-style-type: none"> • First Tier NMI 	No issues

	<ul style="list-style-type: none"> • 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>	
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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'	No issues

Section	Description	Participant Comments
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	No issues
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	No issues
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	No issues
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.	
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	No issues
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)	No issues

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	No issues
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	No issues
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	No issues
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No issues
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	No issues
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	No issues
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No issues
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No issues
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No issues
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No issues

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	No issues
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	No issues
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No issues
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No issues
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No issues
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues
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	No issues
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No issues

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)	No issues

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	No issues
3.5	Remove reference to 'first tier load'	No issues
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	No issues
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.	No issues

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>	No issues
12.3	<p>Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.</p>	No issues
13.1	<p>Change all references in section 13.1 from Market Load to Market Connection Point</p>	No issues
13.5	<p>Change reference from 'market load' to <i>market connection point</i></p>	No issues

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	No issues

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	No issues

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).	No issues

Guide to the Role of the Metering Coordinator

Section	Description	Participant Comments
4.1	Remove <i>small generating units</i> and <i>market generating units</i> and include <i>non-market bidirectional units</i> and <i>small resource connection point</i> .	No issues

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	No issues

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.	No issues

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	No issues

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.	No issues