

IIR response template for IN004/20 (BL and TSF changes in NSW/ACT) – Responses to be emailed to [grcf@aemo.com.au](mailto:grcf@aemo.com.au) by COB 16 August 2021.

Review comments submitted by: AGL

Date: 16 Aug 2021

Contact Person: *Mark Riley*

Please complete sections 1 and 2. Section 3 is optional.

Section 1 - General Comments on the Impact and Implementation Report

Topic	Please Provide Response Here
<p>Sections 1 to 9 of the IIR sets out details of the proposal.</p> <p>Does your organisation support AEMO’s assessment of the proposal (i.e. does your organisation believe that AEMO has adequately described the requirements and surrounding context of the proposal)?</p> <p>If no, please specify areas in which your organisation disputes AEMO’s assessment (include IIR section reference number) of the proposal and include information that supports your organisation’s rationale for not supporting AEMO’s assessment.</p>	<p>AGL considers that the proposal has been well considered by both AEMO and industry. There are some minor additional comments proposed to ensure clarity in the procedures.</p>

## Section 2 – Comments on RMP changes

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

## Retail Market Procedures (NSW/ACT)

RMP Clause #	Issue / Comment	Proposed text <i>Red-strikeout</i> means delete and <i>blue underline</i> means insert	AEMO Response (AEMO only)
A2.1 (b)(v)	This section relates to non-daily read meters, which AGL assumes would include any non-daily meter read cycle (eg monthly), therefore AGL suggests that the clause be amended slightly to align with the section header.	(v) For <u>non-daily</u> <del>quarterly</del> read meters which have at least 12 months' consumption history and are ineligible for Type 1 calculation of <i>base load</i> and <i>temperature sensitivity factor</i> due to.....	
A3.2(a)(v)	This section relates to non-daily read meters, which AGL assumes would include any non-daily meter read cycle (eg monthly), therefore AGL suggests that the clause be amended slightly to align with the section header.	(v) For <u>non-daily</u> <del>quarterly</del> read meters which have at least 12 months' consumption history and are ineligible for Type 1 calculation of <i>base load</i> and <i>temperature sensitivity factor</i> due to.....	
	Question for clarity – can a volume boundary / volume boundary-hybrid be daily read meters or are they always non-daily read meters ?		
A2.1(c)	As headers are generally only for convenience, should the meter read type be clearly spelt out as being 'non-daily';	A <i>Network Operator</i> must use this estimation methodology where a <i>delivery point</i> in respect of which the <i>estimated meter reading</i> is to be undertaken has less than 12 months' consumption history and where the <i>delivery point</i> is not metered by a <u>non-daily</u> volume boundary meter or a <u>non-daily</u> volume boundary hybrid meter.	

\*\*\*Participants are to complete the relevant columns below in order to record their response.\*\*\*

Retail Market Procedures (NSW/ACT)

A2.1 (c1)	As headers are generally only for convenience, should the meter read type be clearly spelt out as being 'non-daily';	A <i>Network Operator</i> must use this estimation methodology where a <i>delivery point</i> in respect of which the <i>estimated meter reading</i> is to be undertaken has less than 12 months' consumption history and where the <i>delivery point</i> is not metered by a <a href="#">non-daily volume boundary meter</a> or a <a href="#">non-daily volume boundary hybrid meter</a> .	
A2.1(c1) various A3.2 (b1) various		Insert <a href="#">non-daily</a> against <a href="#">volume boundary</a> and <a href="#">volume boundary hybrid</a>	

Section 3<sup>1</sup> – Additional feedback that is not part of this consultation but warrants further investigations / discussions.

Topic	Please Provide Response Here
<p>Does your organisation have any feedback / suggestions that closely relate to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please included your feedback / suggestions.</p>	<p>Item for noting IN010/21 – Further information:</p> <p>Victorian / QLD TSF is defined in GJ, but while Base Load would also be in GJ is it not specified in the procedures</p> <p><b>base load</b>, in relation to a <i>distribution supply point</i>, means the level of gas consumption at that <i>supply point</i> that is not affected by the weather.</p> <p><b>temperature sensitivity factor</b>, in relation to a <i>distribution supply point</i>, means the incremental gas consumption at that <i>supply point</i> that is <b>the GJ per EDD</b> calculated in accordance with Attachment 6.</p> <p>NSW TSF is in MJ as is Base Load, but again Base Load UoM is not specified in the procedures.</p> <p><b>base load</b> In relation to a <i>delivery point</i>, the level of gas consumption at that <i>delivery point</i> that is not affected by the weather.</p> <p><b>temperature sensitivity factor</b> In relation to a <i>delivery point</i>, the incremental gas consumption at that <i>delivery point</i>; that is, <b>the MJ per EDD</b> calculated in accordance with Attachment 2 and Attachment 3.</p> <p>SA procedures do not specify units of measure.</p> <p>As these terms are used across multiple procedures but with different Units of Measure, it is suggested that UoM should be incorporated during updates to ensure clarity for all users.</p>

<sup>1</sup> Note - This feedback will be reviewed by AEMO at a later date, therefore will not be used for this consultation. AEMO will complete a preliminary assessment of the feedback assess the feedback and it may then form part of another consultation or the annual prioritisation process