

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AusNet Services

Submission Date: 13 November 2020

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the retail Procedures (Wholesale Demand Response) consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

1. Issues Related to Consultation Subject Matter

Question	Participant Comments
Do you agree with the proposed changes to provide additional clarification to support 5MS? If not, please provide an explanation of why you do not support the proposed changes.	AusNet Services supports the proposed changes required to support 5MS.
Do you agree that the DRSP will need to know of planned outages?	<p>AusNet Services supports that the DRSP will need to be aware of planned outages. Planned outage notification will be made available via the AusNet Services website, as per the current process for Retailers.</p> <p>Please note that the NERR does not entitle the DRSP to planned outage notifications.</p>
Do you agree that a PIN is the best mechanism for advising the DRSP?	AusNet Services does not support providing planned outage notifications to a DRSP via a PIN OWN B2B transactions as this diverts from current established processes within Victoria and the rest of the NEM.

Question	Participant Comments
Does it need to be modified? Is there a better alternative?	<p>Unlike the FRMP there is no obligation to provide the DRSP with information on planned outages.</p> <p>The introduction of a PIN OWN specifically for DRSPs imposes a significant change to AusNet Services existing systems and processes. AusNet Services proposes that, like retailers, the DRSP should view planned outages via the DBs Website as per the current process with Retailers. Meter data already shows when a site is temporarily without supply and DRSPs would use this to reconcile outages noting they would still need to contend with unplanned outages.</p>
Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?	AusNet Services does not support the introduction of the PIN OWN for planned outage notification to the DRSPs, as per previous responses.
Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?	AusNet Services support the proposed amendments.
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	AusNet Services supports the receipt of COMPLETED notifications for the Change Requests identified.
Do you agree with the proposed changes to the B2B Guide? If	AusNet Services supports the proposed changes to the B2B Guide.

Question	Participant Comments
not, please provide an explanation of why you do not support the proposed changes.	
Do you agree with the proposed changes to the B2B Participant Process? If not, please provide an explanation of why you do not support the proposed changes.	AusNet Services supports the proposed changes to the B2B Participant Process.
Are there any other changes to the B2B Guide that need to be made to support WDR?	AusNet Services has not identified additional changes required to the B2B Guide to support WDR.
Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	AusNet Services has not identified any related issues for AEMO's consideration, in regard to the retail procedures to support WDR.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	<p>Wording is misleading, the first sentence indicates that DRSP can only be applied to Large or Wholesal NMI Classifications but the subsequent sentence also includes SMALL NMI Classficiations. Suggest this be reworded as per below;</p> <p>The DRSP is assigned to NMI’s where the loads have been classified as wholesale demand response units for which the DRSP is responsible. A DRSP can only be assigned to NMIs with the following NMI Classifications:</p> <ul style="list-style-type: none"> • LARGE; • WHOLESAL; or • SMALL (where the End User has entered into an agreement with its retailer in accordance with rule 5(2)(a) of the National Energy Retail Rules to aggregate the premises referred to in subparagraph (2)(i) with other premises).
2.10(h)	AEMO to Populate MSATS with the DRSP for the appropriate NMIs where the loads have been classified as wholesale demand response units.	Agreed.
6.1.8	Inclusion of DRSP role in notification of change.	Agreed.
6.2.8	Inclusion of DRSP role in notification of change.	Agreed.
10.1.7	Inclusion of DRSP role in notification of change.	Agreed.

Section	Description	Participant Comments
10.2.7	Inclusion of DRSP role in notification of change.	Agreed.
10.3.7	Inclusion of DRSP role in notification of change.	Agreed.
10.4.8	Inclusion of DRSP role in notification of change.	Agreed.
10.5.8	Inclusion of DRSP role in notification of change.	Agreed.
10.6.7	Inclusion of DRSP role in notification of change.	Agreed.
11.1.7	Inclusion of DRSP role in notification of change.	Agreed.
11.2.7	Inclusion of DRSP role in notification of change.	Agreed.
11.3.7	Inclusion of DRSP role in notification of change.	Agreed.
12.3.7	Inclusion of DRSP role in notification of change.	Agreed.
12.4.7	Inclusion of DRSP role in notification of change.	Agreed.
12.5.7	Inclusion of DRSP role in notification of change.	Agreed.

Section	Description	Participant Comments
12.6.7	Inclusion of DRSP role in notification of change.	Agreed.
13.1.7	Inclusion of DRSP role in notification of change.	Agreed.
13.2.8	Inclusion of DRSP role in notification of change.	Agreed.
13.3.7	Inclusion of DRSP role in notification of change.	Agreed.
13.4.7	Inclusion of DRSP role in notification of change.	Agreed.
13.5.7	Inclusion of DRSP role in notification of change.	Agreed.
13.6.7	Inclusion of DRSP role in notification of change.	Agreed.
13.7.8	Inclusion of DRSP role in notification of change.	Agreed.
13.8.9	Inclusion of DRSP role in notification of change.	Agreed.
14.1.5	Inclusion of DRSP role in notification of change.	Agreed.
14.2.5	Inclusion of DRSP role in notification of change.	Agreed.

Section	Description	Participant Comments
15.1.4(d)	AEMO to populate fields.	AusNet Services supports the inclusion of the RoLR, NSP2, DRSP and TNI Code 2 fields within CRC5100/1.
15.1.7	Inclusion of DRSP role in notification of change.	AusNet Services supports the inclusion of the DRSP and NSP2 roles for receipt of the COMPLETED notification for CRC 5100/5101
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	Agreed.

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures.	Agreed.
2.1.8	Inclusion of DRSP role in notification of change.	Agreed.
2.2.8	Inclusion of DRSP role in notification of change.	Agreed.
5.2.7	Inclusion of DRSP role in notification of change.	Agreed.

Section	Description	Participant Comments
5.3.7	Inclusion of DRSP role in notification of change.	Agreed.
5.4.7	Inclusion of DRSP role in notification of change	Agreed.
5.5.7	Inclusion of DRSP role in notification of change.	Agreed.
6.1.7	Inclusion of DRSP role in notification of change.	Agreed.
6.2.7	Inclusion of DRSP role in notification of change.	Agreed.
6.3.7	Inclusion of DRSP role in notification of change.	Agreed.
7.2.6	Inclusion of DRSP role in notification of change.	Agreed.
7.3.7	Inclusion of DRSP role in notification of change.	Agreed.
7.4.7	Inclusion of DRSP role in notification of change.	Agreed.
8.1.7	Inclusion of DRSP role in notification of change.	Agreed.
8.2.9	Inclusion of DRSP role in notification of change.	Agreed.

Section	Description	Participant Comments
8.3.7	Inclusion of DRSP role in notification of change.	Agreed.
8.4.7	Inclusion of DRSP role in notification of change.	Agreed.
8.5.7	Inclusion of DRSP role in notification of change.	Agreed.
8.6.7	Inclusion of DRSP role in notification of change.	Agreed.
8.7.8	Inclusion of DRSP role in notification of change.	Agreed.
9.1.4	AEMO to populate fields.	Agreed.
9.1.7	Inclusion of DRSP role in notification of change.	Agreed.
10.1.5	Inclusion of DRSP role in notification of change.	Agreed.
10.2.5	Inclusion of DRSP role in notification of change.	Agreed.

4. Metrology Procedure: Part B

Section	Description	Participant Comments
12.5	Update to replace 'verification' with 'Validation'. Amend the section heading and introduction paragraph to better align with terminology used in SLP MP clause 4.2(b).	This question does not correlate to the consultation at hand.

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	AusNet Services supports the inclusion of the DRSP role for consultation on re-substitution.
2.2(n)	Insertion of the words "as required or".	Agreed.
3.2(g)	Inclusion of DRSP role.	Agreed.
3.2(h)	Inclusion of DRSP role.	Agreed.
3.3.6	Inclusion of DRSP role.	Agreed.

Section	Description	Participant Comments
3.3.8	Inclusion of DRSP role.	Agreed.
14.1	Deletion of 'Jurisdiction' and replaced with "retailer".	Agreed.
14.2.1	Inclusion of the words "or End User transfer,".	Agreed.
14.2.2	Inclusion of the words "or End User transfer,".	Agreed.
14.2.2(b)	New clause "Utilise a reason code of '67' for End User transfers,".	Agreed.
14.3(g)	Addition of the reason code 67.	Agreed.

6. Glossary and Framework

Section	Description	Participant Comments
Glossary	Addition of the description of DRSP.	It would be beneficial to include a description of what a DRSP.

7. B2B Guide

Section	Description	Participant Comments
5.1	Inclusion of the DRSP role in the B2B transactions and Participants table.	Agreed.
Table 1	Inclusion of DRSP role as an initiator for PMD Meter Data Process.	Agreed.
Table 1	Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Agreed.
Table 1	Inclusion of DRSP role as a recipient of Meter Data Notification.	Agreed.
6.6.1(a)	Inclusion of the DRSP role.	Agreed.
6.6.2(a)	Inclusion of the DRSP role.	Agreed.

8. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	Agreed.
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u> .	Agreed.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u> .	Agreed.
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Agreed.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Agreed.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Agreed.