

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Endeavour Energy

Submission Date: 17/11/2020

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
<p>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.</p>	<p>Where a RM report is pushed we suggest that AEMO provide more detail on the parameters of the report, eg the date range of the report, days the report will be run etc, so that participants receiving the RM report are aware of these report parameters.</p> <p>We note that AEMO intends to push some reports, like RM11 and RM26, to MDPs – this will be helpful as these reports are frequently used by MDPS. However, since it is pushed by AEMO the report parameters will be defined by AEMO. For better flexibility we suggest that MDPs be allowed to obtain the RM9, RM11 and RM26 via request and subscription. This will allow MDPs to better manage their obligations and business process by defining when they run the report and the parameters for the report.</p>
<p>Do you agree that the DRSP will need to know of planned outages?</p>	<p>We agree that a DRSP will need to consider factors that may inhibit the customer's ability to respond to a wholesale demand response activity, which can include:</p> <ul style="list-style-type: none"> • A planned outage initiated by the DNSP • A planned outage initiated by the FRMP

Question	Participant Comments
	<ul style="list-style-type: none"> • A planned outage initiated by the customer • Unplanned outages
<p>Do you agree that a PIN is the best mechanism for advising the DRSP? Does it need to be modified? Is there a better alternative?</p>	<p>Currently we do not send a PIN for planned outages we initiate, instead we notify the customer directly. We wish to highlight that it is not current industry practice for the DNSP to send a PIN for planned outages (see table 1 of the B2B Guide).</p> <p>We note that a PIN would not provide for the following:</p> <ul style="list-style-type: none"> • A planned outage initiated by the customer • Unplanned outages • Extra time required by the customer to ramp down or ramp up their load due to a planned outage initiated by the DNSP or FRMP <p>Should DNSPs be obligated to send a PIN, then there would be significant cost for us and it would be challenging to have it completed by October 2021 due to the complexity and competing priorities of other industry changes.</p> <p>We note that the customer must be aware and be actively involved in a wholesale demand response given that they will have to initiate or manage any changes to their load or generation. Therefore, as an alternative solution, the customer should be responsible for communicating any factors that may prevent them from meeting their obligations, such as planned outages, to the DRSP.</p>
<p>Do you agree that the PIN should be provided to the DRSP by Retailers</p>	<p>We disagree for the reasons provided above</p>

Question	Participant Comments
and Distribution Network Service Providers?	
<p>Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?</p>	<p>It is not clear if the scenario where a meter becomes faulty or communications with the meter cannot be established has been considered. Although metering data can be substituted it may have adverse financial impacts, either to the customer or to the FRMP, if substitution is required for a period covering a wholesale demand response event. We suggest AEMO considers the following:</p> <ul style="list-style-type: none"> • Not approve a NMI to be registered to be a wholesale demand response unit if AEMO is aware that the meter is faulty or that communications with the meter cannot be established. • AEMO considered the implications on WDR when considering a meter fault exemption application • AEMO not allow a WDR NMI to bid if AEMO is aware of a meter fault that is not fixed within the timeframe and there is no approved exemption, the exemption has expired or the exemption is revoked <p>Other matters for AEMO’s consideration are:</p> <ul style="list-style-type: none"> • How will AEMO communicate to the DNSP that there is a DRSP for a market child NMI, noting that a DNSP is not associated with a market child NMI but changes to the energy at a market child NMI impacts the DNSP via the parent NMI? • How will AEMO communicate which NMIs are associated with an WDRU aggregation so that the DNSP can consider if the aggregation is or will likely impact on the performance of the network?

Question	Participant Comments
	<ul style="list-style-type: none"> How will AEMO make visible to participants like MDPs and DNSPs that a wholesale demand response occurred for a NMI so that exception to meter data validations (for example significant drop in load) can be managed in an efficient manner?

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	<p><u>2.9. Demand Response Service Provider (DRSP)</u></p> <p><u>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:</u></p> <ul style="list-style-type: none"> <u>LARGE</u> <u>WHOLESALE</u> <p><u>Or a SMALL NMI Classification 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.</u></p> <p>The reference to subparagraph (2)(i) is confusing because it is not clear what this is referring to. We understand that this is meant to reference clause 2.3.6.m.2.i of the NER – if this is correct then we suggest that this be made clearer, if this is not correct then could you please clarify what clause it is referring to?</p>

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
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4. Metrology Procedure: Part B

Section	Description	Participant Comments
3.2(g)	Inclusion of DRSP role.	<p>(g) The MDP may perform all Substitution types except type 16 or 18 without the agreement of the affected FRMP, LNSP, DRSP or LR. MDPs may change the quality flag to an existing type 16 or 18 Substitution without seeking further agreement from those parties.</p> <p>For consistency with clauses 2.2.j, 3.3.6 and 3.3.8, the above should be 'DRSP and LR' not 'DRSP or LR'.</p>
3.2(h)	Inclusion of DRSP role.	<p>(h) The MDP must notify the LNSP, DRSP or LR and the FRMP for the <i>connection point</i> of any Substitution within two <i>business days</i> of the Substitution being carried out. Notification is to be achieved via the Participant <i>metering data</i> file as detailed in the Metering Data File Format (MDFF).</p> <p>Grammar error: Replace 'DRSP or LR and the FRMP' with 'DRSP, LR and the FRMP'</p>

5. Glossary and Framework

Section	Description	Participant Comments
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6. B2B Guide

Section	Description	Participant Comments
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7. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
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8. MSATS Procedures MDM Procedure

Section	Description	Participant Comments
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9. Understanding Load Profiles Published from MSATS

Section	Description	Participant Comments
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