

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: *United Energy*

Submission Date: *16 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.	
Do you agree that the DRSP will need to know of planned outages?	United Energy supports the DRSP being notified of a planned interruption.
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?	United Energy strongly disagrees that a PIN is the appropriate mechanism to advise the DRSP of a distributor initiated planned interruption. Distributors do not use a PIN for any purpose. To introduce the use of a PIN, for a small number of NMIs, would be very costly and complex for it would impact multiple network systems, including those used for market interaction and network management.

Question	Participant Comments
	<p>Current process, where the distributor notifies the customer with at least 4 business days' notice is a better alternative for notification of the DRSP. As the customer is actively involved in a wholesale demand response, initiating or managing changes related to their load or generation, it would then be expected that the customer would advise their DRSP of the upcoming outage.</p>
<p>Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?</p>	<p>United Energy strongly disagrees that the PIN be used for distributor initiated interruptions for the aforementioned reasons.</p>
<p>Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?</p>	
<p>Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?</p>	
<p>Do you agree with the proposed changes to the B2B Guide? If not, please provide an explanation of why you do not support the proposed changes.</p>	

Question	Participant Comments
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.	
Are there any other changes to the B2B Guide that need to be made to support WDR?	
Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	
2.10(h)	AEMO to Populate MSATS with the DRSP for the appropriate NMIs where the loads	

Section	Description	Participant Comments
	have been classified as wholesale demand response units.	
6.1.8	Inclusion of DRSP role in notification of change.	
6.2.8	Inclusion of DRSP role in notification of change.	
10.1.7	Inclusion of DRSP role in notification of change.	
10.2.7	Inclusion of DRSP role in notification of change.	
10.3.7	Inclusion of DRSP role in notification of change.	
10.4.8	Inclusion of DRSP role in notification of change.	
10.5.8	Inclusion of DRSP role in notification of change.	
10.6.7	Inclusion of DRSP role in notification of change.	
11.1.7	Inclusion of DRSP role in notification of change.	
11.2.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
11.3.7	Inclusion of DRSP role in notification of change.	
12.3.7	Inclusion of DRSP role in notification of change.	
12.4.7	Inclusion of DRSP role in notification of change.	
12.5.7	Inclusion of DRSP role in notification of change.	
12.6.7	Inclusion of DRSP role in notification of change.	
13.1.7	Inclusion of DRSP role in notification of change.	
13.2.8	Inclusion of DRSP role in notification of change.	
13.3.7	Inclusion of DRSP role in notification of change.	
13.4.7	Inclusion of DRSP role in notification of change.	
13.5.7	Inclusion of DRSP role in notification of change.	
13.6.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
13.7.8	Inclusion of DRSP role in notification of change.	
13.8.9	Inclusion of DRSP role in notification of change.	
14.1.5	Inclusion of DRSP role in notification of change.	
14.2.5	Inclusion of DRSP role in notification of change.	
15.1.4(d)	AEMO to populate fields.	
15.1.7	Inclusion of DRSP role in notification of change.	
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures.	

Section	Description	Participant Comments
2.1.8	Inclusion of DRSP role in notification of change.	
2.2.8	Inclusion of DRSP role in notification of change.	
5.2.7	Inclusion of DRSP role in notification of change.	
5.3.7	Inclusion of DRSP role in notification of change.	
5.4.7	Inclusion of DRSP role in notification of change	
5.5.7	Inclusion of DRSP role in notification of change.	
6.1.7	Inclusion of DRSP role in notification of change.	
6.2.7	Inclusion of DRSP role in notification of change.	
6.3.7	Inclusion of DRSP role in notification of change.	
7.2.6	Inclusion of DRSP role in notification of change.	
7.3.7	Inclusion of DRSP role in notification of change.	

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

Section	Description	Participant Comments
10.2.5	Inclusion of DRSP role in notification of change.	

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).	

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	

Section	Description	Participant Comments
2.2(n)	Insertion of the words “as required or”.	
3.2(g)	Inclusion of DRSP role.	
3.2(h)	Inclusion of DRSP role.	
3.3.6	Inclusion of DRSP role.	
3.3.8	Inclusion of DRSP role.	
14.1	Deletion of ‘Jurisdiction’ and replaced with “retailer”.	
14.2.1	Inclusion of the words “or End User transfer,”.	
14.2.2	Inclusion of the words “or End User transfer,”.	
14.2.2(b)	New clause “Utilise a reason code of ‘67’ for End User transfers,”.	
14.3(g)	Addition of the reason code 67.	

6. Glossary and Framework

Section	Description	Participant Comments
Glossary	Addition of the description of DRSP.	

7. B2B Guide

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

8. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

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