

# RETAIL ELECTRICITY MARKET PROCEDURES October 2021 CONSULTATION

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:***            *AGL*

***Submission Date:***    *15 Nov 2021*

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## 1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the Retail Electricity Market Procedures October 2021 consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures and the following proposed changes by proponents and AEMO to implement recommended process improvements.

## 2. Questions on proposed changes

Heading	Participant Comments
<p>Does your organisation support the proposals contained in the Issues Paper? If not, please specify areas in which your organisation disputes AEMO’s assessment (include ICF reference number) of the proposal and include information that supports your rationale why you do not support AEMO’s assessment.</p>	<p>In general AGL supports the proposed changes, although AGL has specific issues with certain outcomes/changes (Metrology A and NMI Classification), which have specific comments.</p>
<p>Are there better options to accommodate the change proposals that better achieve the required objectives? What are the pros and cons of these options? How would they be implemented?</p>	<p>In general, the proposed outcomes should be appropriate – noting the items which AGL has issues with and which have associated proposals.</p>
<p>What are the main challenges in adopting these proposed changes? How should these challenges be addressed?</p>	<p>As with the majority of procedural changes, the outcome will require business and system process changes.</p>
<p>Do you have any further questions or comments in relation to the proposals described above?</p>	<p>No.</p>
<p>Does your organisation have any feedback / suggestions that closely relates to the scope or impacts this consultation, but the nature of the feedback / suggestion warrant further investigations / discussion? If so, please include your feedback / suggestions. Please note that 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.</p>	<p>Yes.  See comments below, in particular the issue of the NMI classification changes, which would see sites with a small load and very large export be classified as a ‘small’ NMI.</p>

### 3. Feedback on proposed amendments

Document	Participant Comments
B2B E-Hub Participant Accreditation and Revocation Process (CIP_045 B2B E-Hub Participant Accreditation Procedure Clarification)	AGL seeks more feedback on the regulatory requirements / obligations for third party B2B participants and suggest that B2B access only be provided to Registered Participants. See comments below.
Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligation (MSATS Procedures: CATS) (CIP_050 NREG and GENERATR NMI Classifications)	<p>As advised, AGL believes that there is a gap in the NMI classifications that leave sites with large volume output (eg Solar farms) but small consumption, with the option to classify the NMI as small. AGL does not consider this an appropriate outcome.</p> <p>The classifications are predominantly based on consumption, not through put. AGL submitted a further adjusted proposed amendment to the NREG definition to capture these sites (see S10) . AEMO did not agree with the original proposed amendment and indicated that they would review the issue and provide advice.</p> <p>AGL would prefer to see this issue resolved as part of this consultation.</p>
Meter Data File Format Specification (MDFF) NEM12 & NEM13 (CIP_042 Reason Code)	AGL supports this change
Metrology Part A (CIP_046 Clarification of Clause 12.5, CIP_048 Reference to AS60044)	AGL supports this change
Standing Data for MSATS (Standing Data document) (CIP_049 Controlled Load Enumerations, CIP_053 GPS Coordinates Minimum Standard)	AGL supports this change

#### 4. Feedback on consolidations

Document	Clause	Participant Comments
CATS		AGL supports this change
WIGS		AGL supports this change
Metrology Part A		See comments below – V7.2 was not included in the consolidation.
Metrology Part B		AGL supports this change
MSATS Procedures: MDM Procedures		AGL supports this change
NEM RoLR Processes Part A and Part B		AGL supports this change
Retail Electricity Market Procedures – Glossary and Framework (Glossary and Framework)		AGL supports this change
Standing Data document		AGL supports this change

## 5. MDFF NEM12 & NEM13

Section	Description	Participant Comments
Appendix E		AGL supports the change

## 6. B2B E-Hub Participant Accreditation and Revocation Process

Section	Description	Participant Comments
2.1.1 / 2.5	Regulatory Obligations	<p>Obligations to follow B2B procedures and protocols arise from being registered in the market. If a party is not a registered participant (as considered by 2.5(b)) what regulatory requirements are placed on them when they access Market Net or exchange B2B transactions with other Registered Participants, to ensure they adhere to industry practice and standards and do not disrupt participant B2B processes ?</p> <p>The additional category added to Appendix B is DRSP, which is a Registered Participant.</p> <p>Suggest delete the statement regarding not being registered:</p> <p><i>b. Third Party B2B Participants, <del>who are not Registered Participants</del> must complete the checklist and associated documentation in Appendix C.</i></p>
Appendix C	Regulatory Obligations	Suggest that Appendix C could then be deleted as this would form part of the registration process.



## 7. Metrology Procedure: Part A - National Electricity Market (Metrology Procedure: Part A)

Section	Description	Participant Comments
12.2	V7.32 of Met Part A has been missed in the consolidation effort and CI 12.2 should look like the attached:	<p><u>(i) For metering installations that do not have remote acquisition, and where an MC is not a TNSP, the MC must use reasonable endeavours to ensure that each metering installation is read at least every three months, and the Meter Reading frequency is agreed with the FRMP.</u></p> <p><u>(k) When the MC is informed of a metering data collection issue, the MC must:</u></p> <ul style="list-style-type: none"> <li><u>(i) within 15 business days, take the necessary steps to ensure the missing metering data collected;</u></li> <li><u>(ii) ensure that the metering installation's communications interface is maintained to facilitate ongoing collection of metering data;</u></li> <li><u>(iii) ensure that metering data is collected at a frequency that is within the energy data storage capacity of that metering installation such that the metering data collection process prevents the loss of actual metering data, and</u>  <u>ensure that, irrespective of the energy storage capacity of the metering installation, the metering installation reading frequency must not exceed three months since the last actual read was undertaken. The MC must use reasonable endeavours to identify if a metering installation malfunction exists within 7 days from when an MDD informs them that remote acquisition is not available.</u></li> </ul> <p><u>(iv) For metering installations that have remote acquisition, the MC must use reasonable endeavours to collect metering data at a frequency that prevents the loss of actual metering data but at a frequency of no more than 14 days since the last actual metering data was collected when remote acquisition is not available.</u></p>

## 8. Standing Data document

Section	Description	Participant Comments
all		AGL supports the changes.

## 9. MSATS Procedures: MSATS Procedures: CATS

Section	Description	Participant Comments
	<p>AGL has issues with the current requirements for connection points which have small customer loads but large exports (eg site with small consumption but large solar arrays exporting energy).</p> <p>The proposed change leaves sites like this potentially registering as 'small', which is inappropriate.</p>	<p>Proposed further amendment to NREG</p> <p><b>NREG</b></p> <p>Connection point associated with a stand-alone <i>non-registered embedded generator</i> at which:</p> <ul style="list-style-type: none"> <li>• <u>the <i>embedded generating unit</i> is classified by a <i>Market Small Generation Aggregator</i> as a market generating unit; or</u></li> <li>• <u>the <i>embedded generating unit</i> is owned, operated and controlled by a person who meets the requirements of NER 5.3.1A(c)(2) or (3); or</u></li> <li>• <u>the <i>non-registered embedded generator</i>, defined in NER 5A.A.1, meets the requirements of NER 5A.A.2; or</u></li> <li>• <u>the output of the <i>embedded generating unit</i> substantially exceeds the load at that <i>connection point</i>.</u></li> <li>• <del>the output of the <i>embedded generating unit</i> is consumed by a market load at the same connection point.</del></li> </ul>

## 10. MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIS (MSATS Procedures: WIGS)

Section	Description	Participant Comments
	<p>AGL has issues with the current requirements for connection points which have small customer loads but large exports (eg site with small consumption but large solar arrays exporting energy).</p> <p>The proposed change leaves sites like this potentially registering as 'small', which is inappropriate.</p>	<p>Proposed further amendment to NREG</p> <p><b>NREG</b></p> <p>Connection point associated with a stand-alone <i>non-registered embedded generator</i> at which:</p> <ul style="list-style-type: none"> <li>• the <i>embedded generating unit</i> is classified by a <i>Market Small Generation Aggregator</i> as a market generating unit; or</li> <li>• <u>the <i>embedded generating unit</i> is owned, operated and controlled by a person who meets the requirements of NER 5.3.1A(c)(2) or (3); or</u></li> <li>• <u>the <i>non-registered embedded generator</i>, defined in NER 5A.A.1, meets the requirements of NER 5A.A.2; or</u></li> <li>• <u>the output of the <i>embedded generating unit</i> substantially exceeds the load at that <i>connection point</i>.</u></li> <li>• <del>the output of the <i>embedded generating unit</i> is consumed by a market load at the same <i>connection point</i>.</del></li> </ul>

## 11. Metrology Procedure: Part B - National Electricity Market (Metrology Procedure: Part B)

Section	Description	Participant Comments
		AGL Supports the changes

## 12. MSATS Procedures: (Meter Data Management) MDM Procedures

Section	Description	Participant Comments
		AGL Supports the changes

### 13. NEM RoLR Processes Part A and Part B

Section	Description	Participant Comments
		AGL Supports the changes

## 14. Retail Electricity Market Procedures – Glossary and Framework (Glossary/Framework)

Section	Description	Participant Comments
Definition	<p>Controlled Load</p> <p>In consideration of the different methods to control a device such as a battery or air conditioner, which may be done via an inverter or a mechanism other than the meter or network device (eg APIs), AGL suggests the definition be extended.</p>	<p>Propose:</p> <p><i>Load</i> that is controlled <u>by an external process or mechanism, which includes the metering installation</u> (e.g. frequency injection relay or time clock) <u>or a network device</u> and may be separately metered from the remaining <i>load</i> at a <i>metering point</i>.</p>