

Load Profiling Methodologies

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Telstra Energy

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *Load Profiling Methodologies*.

2. Feedback on Load Profiling Objectives and Principles

Question	Participant Comments
1. Do you agree with the proposed objectives and principles?	Telstra Energy agree with the proposed Load Profiling Objectives and Principles.
2. Are there any other objectives and principles you believe should be considered?	<p>Telstra Energy recommend the following additional objective/principle:</p> <ul style="list-style-type: none"> • The methodology should seek to reduce (and preferably avoid) unexpected excessive peaks in settlement values for individual participants <ul style="list-style-type: none"> ○ Participants should not be exposed to excessive settlement outcomes due to the application of inaccurate mathematical assumptions

3. Feedback on Load Profiling Methodologies

Question	Participant Comments
1. Which methodology do you consider would best achieve the objectives and principles? Why?	Of the proposals, Telstra Energy prefer Option 5 as we believe this option best meets the objectives.

Question	Participant Comments
<p>2. Do you consider that an alternative methodology would better achieve the objectives and principles? Please note that the selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analysis and test this alternative.</p>	<p>Telstra Energy recommend a variation to Option 5 which would address the issues attempted to be addressed by Option 5a.</p> <p>In this option, the UAM would be applied to any specific 15- or 30-minute interval approaches rather than crosses the x axis. This would ensure that all intervals with a very small numerator would be subject to the UAM. This number should be set by AEMO in consultation with participants during this consultation.</p> <p>It is the small numerator which is the primary cause of the issue rather than crossing the x axis.</p> <p>Telstra Energy also recommend that in this option AEMO be given the authority under the guidelines to set the level which would trigger to application of UAM. This would mean that changes could be promptly made, where urgent action is required, without the need for timely consultation processes. Of course, AEMO could still consult on the initial setting and any subsequent changes in the absence of urgency.</p> <p>Additionally, Telstra Energy recommend the AEMO systems be established with this level as a configurable parameter so that changes can be implemented without the need for software releases and associated regression and other testing.</p>
<p>3. Do you believe the preferred methodology should be applied to both 5MLPs and</p>	<p>Yes.</p>

Question	Participant Comments
NSLPs where the observed conditions have been met? If no, why?	
4. When do you consider the preferred methodology should be implemented? On 30 May 2023?	If possible, Telstra Energy prefer implementation on the 30 May 2023.

4. Feedback on proposed Other Matters

Question	Participant Comments
1. Do you agree that the proposed amendments associated with obtaining and applying embedded network codes provide for the correct interpretation of the procedures, as well as achieving industry objectives? If no, then please provide a better alternative.	<p>Telstra Energy has experienced difficulty in the past with obtaining embedded network codes from LNSP's where no changes to the distribution infrastructure are required. We support this change as it makes the obligation on LNSP's to provide embedded network codes promptly is made clear.</p> <p>For this reason, Telstra Energy agree with the proposed amendments relating to ICF_055.</p>
2. Do you agree that the inclusion of the 'House Number To Suffix' element enables a better quality site address to be recorded for energy participants? If not, please specify your reasoning.	<p>Telstra Energy believes it is critical that AEMO systems and procedures accurately reflect the relevant Australian Standards, the aseXML schema and all relevant procedures.</p> <p>For this reason, Telstra Energy agree with the proposed amendments relating to ICF_064.</p>

Question	Participant Comments
3. Do you agree with the proposal to removal of the current NMI Discovery Type 3 validation? If not, please specify your reasoning.	<p>Telstra Energy notes the need to address transfers in error is not limited to the retrospective NEM Settlement period. This may be achieved through both on and off market approaches.</p> <p>Accordingly, Telstra Energy agree with the proposed amendments relating to ICF_065.</p>

5. Other Issues Related to the Load Profiling Methodologies and Other Matters

Stakeholders to provide details of other Load Profiling Methodologies related aspects that have not been included in the issues paper and provide details.

Participant Comments