



3 April 2023

Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email to nem.retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Integrating Energy Storage Systems into the NEM: Retail Electricity Market Procedures

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its consultation *Integrating Energy Storage Systems into the NEM: Retail Electricity Market Procedures*.

This submission is provided by Energy Queensland, on behalf of its related entities; Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited; and Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail) and we provide the following comments.

Introduction of GSMALL and GLARGE

Energy Queensland supports efforts to enable more accurate identification of generation capacity at specific connection points, particularly where that will have a meaningful impact to the interactions a retailer would need to have with the customer. However, we note that the proposed changes to National Metering Identifier (NMI) Classification Codes (NCCs) will have significant impacts, including further consultation, and we do not support the proposed Option 1 - the addition of new NCCs into Market Settlement and Transfer Solutions.

In our view, NMI classification is fundamental to most system and processes across all participants and adding new values to that field will have far reaching implications across almost all AEMO procedures. For example, each section in the CATS procedures makes reference to the NMI classification - "Conditions Precedent: NMI Classification Code is SMALL or LARGE". As such, we note the significant effort required to identify all references and understand the implications in changing them.

Further, Ergon Energy Retail has a large number of sites with greater than 10kVA per phase and if implemented, the changes will result in significant system and process impacts to change those values in standing data (and the associated downstream impacts).

Expanded access to the Distributed Energy Resource (DER) Register

Energy Queensland considers that the proposed changes above are unlikely to solve the underlying problem for retailers of how to accurately identify the generation capacity connected behind a NMI. As such, we support Option 3 and consider that expanded access to the DER Register is a more appropriate solution. We acknowledge that access would need to be appropriately managed within the framework of participant obligations, but as a suggestion, retailer access could be enabled via an expansion to the NMI Discovery process, and we would be supportive of any proposals or rule change to enable this change.

We also note that retailers will be included in the DER information provision processes under the consumer data right (CDR) changes and would suggest this is a precedent that could be expanded.

Proposal to introduce new EVCharge code

Energy Queensland acknowledges and supports the desire to identify unique connections such as Standalone EV Charging Stations. However, we do not support unique identifiers for connections for non-stand-alone EV chargers installed behind a customers' metering installation. We also note that the proposed change to introduce EVCHARGE has the potential to require further change in time.

Changes to the allocation of Residential sites to the 'SMALL' NCC

Ergon Energy Retail supports the proposed change to deliver clarity to the Customer Threshold Code for jurisdictional thresholds. However, we disagree with NMI classification based on the customer classification and support reversal of the change implemented in November 2022 as discussed at the 23 February 2023 meeting of AEMO's Electricity Retail Consultative Forum.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me on 0429 394 855 or Laura Males on 0429 954 346.

Yours sincerely,



Alena Christmas
Acting Manager Regulation

Telephone: 0429 394 855
Email: alena.christmas@energyq.com.au