Integrating Energy Storage Systems (IESS)

PROCEDURE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: CitiPower Powercor

Submission Date: 10 July 2023

1. Context

This template is to assist stakeholders in responding to the questions detailed in the Draft Report associated with the *Integrating Energy Storage Systems in the NEM* Rule (IESS Rule) consultation.

2. Consultation questions

Question		Participant Comments
1.	Do you agree with the proposed changes to the Procedures to reflect the requirements of the IESS Rule? If not, please explain the specific draft decision you do not agree with and any proposed alternative solution.	
2.	Are there any gaps in AEMO's Procedure changes for the IESS Rule?	CitiPower Powercor queries how the transition of GENERATR to DGENRATR is going to be undertaken for existing sites as per <i>MSATS Procedure – CATS 5.7</i> ? Suggest AEMO to do this transition with notifications via CR of changes made. CitiPower Powercor recommends keeping Table 6 from Appendix E in the <i>MSATS Procedures: National Metering Identifier Procedure</i> as it provides a clear representation of how the different NMI Classification Codes/CATS Participant IDs are required to be set up.
3.	Do you agree with the proposed approach to ICF_070 (Increase 'Building Name' field length in MSATS)?	CitiPower Powercor understands the proposed approach is combining 2 fields to be one which is 60 characters. Whilst we don't oppose the change, we strongly recommend this is included with wider schema changes rather than just a change for this field.
4.	Do you agree with AEMO's decision to shift the substantive components of ICF_059 to a separate	CitiPower Powercor strongly supports separating ICF_059 to its own consultation.

	consultation process separate from the IESS consultation?	
5.	Do you agree with AEMO's draft decision to amend the Customer Threshold Codes table in CATS to reflect the relevant regulatory instruments in a footnote?	CitiPower Powercor supports this change.
6.	Do you agree with AEMO's draft decision to retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the National Energy Retail Law (NERL)?	CitiPower Powercor supports this decision.