Energy Queensland

10 July 2023

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

Submitted via email: NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Integrating Energy Storage Systems (IESS) into the NEM: Retail Electricity Market Procedures consultation

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to its Draft Report on *Integrating Energy Storage Systems - Retail & Metering Procedures*. We note that submissions are due on 10 July 2023.

This submission is provided by Energy Queensland, on behalf of its distribution network service providers, Energex Limited and Ergon Energy Corporation Limited. We provide the following comments.

<u>Proposed changes to the Procedures to reflect the requirements of the IESS Rule</u> Energy Queensland supports AEMO's proposed changes to the Procedures to reflect the requirements of the IESS Rule.

Proposed approach to ICF 070 (Increase 'Building Name' field length in MSATS Energy Queensland supports AEMO's suggested increase of the Building/Property Name field from 30 characters to 60 characters on the proviso that no change is required to the XML schema. This is due to the IT costs involved in making schema related changes.

Additionally, we support the proposed amendment to the Building/Property Name field on the proviso that its utilisation remains in accordance with the Australian Standard AS4590-1999 and its application remains aligned with the Technical Delivery Specification.

Our preference is for metering location information to make use of the meter location field of the MSATS Meter Register record, as the designated source for this data, rather than the Building/Property Name field being adapted to this purpose.

<u>Decision to shift the substantive components of ICF_059 to a separate consultation process separate from the IESS consultation</u>

Energy Queensland supports AEMO's draft decision to separate components of ICF_059 out of IESS consultation and for a more in-depth review of EV charging stations NCC.

<u>Draft decision to amend the Customer Threshold Codes table in CATS to reflect the</u> relevant regulatory instruments in a footnote

Energy Queensland supports AEMO's draft decision to amend the Customer Threshold Codes table in CATS to reflect the relevant regulatory instruments in a footnote.

<u>Draft decision to retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the National Energy Retail Law (NERL)</u>

Energy Queensland supports AEMO's draft decision to retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the National Energy Retail Law.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact either myself, or Mark Simpson on 0467 837 450.

Yours sincerely

Ben Carberry

Acting Manager Regulation

Phlily

Telephone: 0448 601 438

Email: ben.carberry@energyg.com.au