

Integrating Energy Storage Systems (IESS)

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

Submission Date: 10 Jul 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
<p>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.</p>	<p>PLUS ES currently supports the proposed changes to the Procedures to reflect the requirements of the IESS Rule.</p> <p>We also note a point of concern with respect to the number of enumerations which have been included or may become necessary to include in the NMI Classification Code (NCC) field.</p> <p>We recommend potentially another solution to cater for the increasing enumerations and a way to identify the NMI size, for your consideration. The NCC field (limiting this to a few enumerations) and a new NCC subtype field to identify the various nuances (which are currently solved as additional NCC enumerations), recognising that it is an additional field and hence requiring additional system builds.</p>
<p>2. Are there any gaps in AEMO’s Procedure changes for the IESS Rule?</p>	<p>No comment.</p>
<p>3. Do you agree with the proposed approach to ICF_070 (Increase ‘Building Name’ field length in MSATS)?</p>	<p>PLUS ES supports the proposed approach to ICF_070. Alignment must exist between communication tools to ensure information is not lost.</p>
<p>4. Do you agree with AEMO’s decision to shift the substantive components of ICF_059 to a separate</p>	<p>PLUS ES supports AEMO’s determination to shift the substantive components to a separate consultation.</p>

<p>consultation process separate from the IESS consultation?</p>	
<p>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?</p>	<p>This decision drives future efficiencies such as not requiring opening procedures for consultation when the values change.</p>
<p>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)?</p>	<p>PLUS ES supports AEMO’s draft decision to retain references to Residential and Business in the CATS NCC:</p> <ul style="list-style-type: none"> • For all the reasons provided in previous submissions, including recently made changes and • It provides a point of clarity/standardisation for all market participants using the NCC field.