

Integrating Energy Storage Systems (IESS)

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

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
<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>Red Energy and Lumo Energy (Red and Lumo) agree with the proposed changes and support the refined definition of NREG.</p> <p>We offer questions below requesting clarification of some additional references to Tier 1 and Tier 2 which may have been overlooked and some additional text which appears to have been errantly added to the procedures.</p> <p>:</p>
<p>2. Are there any gaps in AEMO’s Procedure changes for the IESS Rule?</p>	<p>Red and Lumo do have any additional suggestions.</p>
<p>3. Do you agree with the proposed approach to ICF_070 (Increase ‘Building Name’ field length in MSATS)?</p>	<p>Red and Lumo do not agree with progressing ICF_070 if it requires a schema change. Our initial support of the proposal was contingent upon this not requiring a schema change.</p>

<p>4. Do you agree with AEMO’s decision to shift the substantive components of ICF_059 to a separate consultation process separate from the IESS consultation?</p>	<p>Red and Lumo support moving ICF_059 to a separate consultation which contemplates an effective method of identifying generation, storage and demand thresholds.</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>Red and Lumo support the proposal to refer to the relevant regulatory instruments in a footnote.</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>Red and Lumo do not agree and recommend instead that the relevant regulatory instruments are referred to for guidance on whether a NMI is Business or Residential.</p>

taken from [AEMO IESS Proc. Consultation Response - Red and Lumo - Draft](#)

Procedure Drafting Changes

Retail electricity market procedures – Glossary and Framework

Section	Description	Participant Comments
2.7.2	<p>2.7.2. Guidelines for the Clarification of the National Measurement Act</p> <p>AEMO is required by clause 7.16.8 of the NER to establish guidelines that clarify the application of the requirements of the National Measurement Act 1960 (Cth) to metering installations.</p>	<p>Proposed additional amendment - Is the presence of the highlighted text intentional?</p>

	<p>(a) These guidelines have been developed in consultation with the National Measurement Institute and are published on AEMO's website. Metering Data Provision Procedures</p> <p>(b) AEMO is required to publish these procedures in accordance with clause 7.14(a) of the NER. These procedures establish the minimum requirements for the manner and form in which metering data should be provided to a retail customer (or its customer authorised representative) in response to a request from that retail customer or its customer authorised representative to the retailer or the DNSP. UFE Reporting Guidelines</p>	
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MSATS CATS

Section	Description	Participant Comments
2.10.(a)	Continue to invoice (as per NER requirements) the Current FRMP for a Tier 2 Site until it is transferred to another FRMP in accordance with these Procedures	Should there continue to be a reference here to a Tier 2 Site? How do we refer to the historical use of this term if it's removed from the <i>Retail electricity market procedures – Glossary and Framework</i> entirely?
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	Should this also include DIRS in reference to "not SMALL"?

MSATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	Red and Lumo support removal of the current illustrations and tables, replacing them with illustrations relevant to the new combinations of assets behind the NMI.

Metering Data Provision Procedures

Section	Description	Participant Comments
4.3	<p>Include a new energy flow type that reflects the purpose of the rule change to include bidirectional energy flows for generation connection points.</p> <p>vii. Energy Flow Types:</p> <p>A. General Supply usage – means energy flow from the grid to the connection point.</p> <p>(Note: Where the measurement of the retail customer’s generation is combined with the measurement of general supply usage, the general supply usage information is the net of usage and generation, i.e. usage values are positive for excess usage and negative for excess generation).</p>	<p>Red and Lumo look forward to reviewing AEMO’s drafting of the new Energy Flow Type and ask;</p> <p>Will it be necessary to redefine General Supply usage to exclude auxiliary usage for BDU?</p> <p>Is it necessary to describe that bi-directional flow must be separately metered from General Supply, and may be specific to a load type?</p>

Section	Description	Participant Comments
	<p>B. Controlled Load (only if applicable, i.e. if separately measured) – means energy flow from the grid to the connection point.</p> <p>C. Generation (only if applicable, i.e. if separately measured) – means energy flow to the grid from the connection point.</p> <p><u>D.Bi-directional means energy flow; to the grid from the connection point, or from the grid, to the connection point, for the purposes of...</u></p> <p><u>... which is separately metered and not General Supply usage or Controlled Load.</u></p>	