Integrating Energy Storage Systems (IESS)

PROCEDURE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: TasNetworks

Submission Date: 07/07/2023

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.	Yes.
2.	Are there any gaps in AEMO's Procedure changes for the IESS Rule?	Not to TasNetworks knowledge.
3.	Do you agree with the proposed approach to ICF_070 (Increase 'Building Name' field length in MSATS)?	No. TasNetworks believes this change is not required and may be in contradiction to AS4590.
		AS4590 notes that Building/Property Name comprises two separate 30 character fields.
		As an LNSP, who authors/maintains the data in this field, our system currently only caters for a single 30 character 'Building Name' field, hence aligning with current MSATS.
		If MSATS can currently only store 30 characters, then recipients of this data would only have ever had up to 30 characters of information provided via a CATS Notification.
		Would a more preferable solution be to update the 'Standing Data for MSATS' to indicate only a single field for use, acknowledging the aseXML schema allows for two 30 character fields. Should justification warrant it, a second 'Building Name' field could be

		added to MSATS at a later time when other MSATS changes were undertaken that required participants to make related system changes.
		AEMO's assessment in the draft report indicates that the greater detail would assist with metering installation and malfunction works, however other fields such as 'Location Descriptor' and/or 'Location' could be utilised for this purpose.
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?	Yes.
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?	Yes.
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)?	Yes.