



SAPS Retail Procedures – Error Corrections and Clarifications

Draft Report – Expedited consultation
for the National Electricity Market

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Explanatory statement and consultation notice

The publication of this draft report commences AEMO's expedited consultation on the proposal (**Proposal**) to change the Retail Procedures as follows:

- Change the MSATS Procedure – MDM Procedure (**MDM Procedure**) v 4.31 to:
 - Create a new report (RM51) to satisfy the requirement of the SAPS rule¹ to provide SAPS Generators with the data AEMO used to calculate their share of the generation on a SAPS. The participants at the NEM Implementation Forum supported the creation of the RM51 report.
 - Clarify the descriptions for the RM43 and RM46 reports, without changing the meaning of the descriptions, or changing the underlying reports.
- Republish the Service Level Procedure Metering Provider Services (**MP SLP**) as version 1.6 (instead of version 1.5) and correct the version table to indicate version 1.6 (instead of version 1.5).
- Amend the Service Level Procedure Metering Data Provider Services (**MDP SLP**) to reflect the preferred option to resolve the conversion of non-5-minute metering data as set out in AEMO's Final Report².

AEMO proposes to amend the Retail Procedures in the form published with this draft report, with the proposed effective date of 30 May 2023:

- MDM Procedure version 4.31.
- MP SLP version 1.6.
- MDP SLP version 2.3.

AEMO is undertaking this consultation in accordance with the requirements of clause 8.9.3 of the National Electricity Rules (**NER**).

AEMO considers that the expedited rules consultation procedure is appropriate for the following reasons:

- The Proposal is a Non-material Proposal because it will be unlikely to have a significant impact on the NEM or on the activities of the related Registered Participants (NER 8.9.1(a)), including:
 - Investment or operational decisions in the market (e.g. arising from information provision requirements on industry, including information quantity, nature, detail, timing, etc).
 - The costs of participating in the market or complying with the market requirements (e.g. arising from changes in how participants are required to provide their services or operate or the availability of information).
- The standard rules consultation procedure would not apply, because the Proposal would not:
 - Introduce, or materially vary, substantive participant rights or obligations.
 - Require significant expenditure by, or to be funded by, participants.
 - Require material changes to participant systems.

¹ National Electricity Amendment (Regulated Stand-Alone Power Systems) Rule 2022:

<https://www.aemc.gov.au/sites/default/files/2022-02/SAPS%20NER%20amending%20rule%20final%202022.pdf>

² AEMO, Final Report on Standalone Power Systems (SAPS) – Identifying a SAPS NMI in MSATS, 3 November 2022:

https://aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2022/standalone-power-stations-in-msats/final/identifying-a-saps-nmi-in-msats-final-determination.pdf?la=en

- Change the way participants interact with customers or service providers, especially in a way that could be considered a disadvantage.

If any person considers that AEMO should instead follow the standard consultation procedure, the person can submit a procedure change request to AEMO within 10 business days after publication of this draft report. A request must be sent to nem.retailprocedureconsultations@aemo.com.au by 5:00pm (Sydney time) on **10 April 2023**. In accordance with NER 8.9.3(b), a request must include reasons why the person considers the Proposal is not a Non-material Proposal as defined in NER 8.9.1 – that is, why it would have a significant effect on the NEM, or on the activities of a relevant group of registered participants.

AEMO invites written submissions from interested persons on the Proposal in this draft report, to nem.retailprocedureconsultations@aemo.com.au, by 5:00pm (Sydney time) on **27 April 2023**.

Submissions may include alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law. Please include supporting reasons.

The following important information about submissions, including procedure change requests:

- All submissions will be published on AEMO's website, other than confidential content.
- All submissions must be forwarded in electronic format (both pdf and Word).
- Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.
- Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO under NER 8.9.1(k) to discuss any particularly complex, sensitive or confidential matters relating to the proposal. Meeting requests must be received by the end of the submission period and include reasons for the request. AEMO will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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1. Stakeholder consultation process

AEMO is consulting on the Proposal in accordance with the expedited consultation procedure in NER 8.9.3.

This draft report uses terms defined in the NER, which are intended to have the same meanings.

AEMO's process and expected timeline for this consultation are outlined below. Future dates may be adjusted and additional steps may be included as needed, as the consultation progresses.

Table 1 Consultation process and timeline

Consultation steps	Dates
Draft report published	24 March 2023
Procedure change request deadline	10 April 2023
Submissions due on draft report	27 April 2023
Final report published	26 May 2023

At any time before the final report is published, and based on information received through submissions to this draft report, any procedure change requests under NER 8.9.3(b) or otherwise, AEMO may decide that the proposal can no longer be considered non-material. If so, AEMO will switch to the standard consultation procedure by publishing a notice under NER 8.9.3(f).

AEMO's consultation webpage for the proposal is at <https://aemo.com.au/en/consultations>, which will contain all previous published papers and reports, written submissions, and other consultation documents or reference material (other than material identified as confidential).

In developing the proposal, AEMO undertook informal consultation through the NEM2025 Implementation Forum.

2. Background

2.1. Context for this consultation

AEMO and participants have identified the changes which are the subject of the Proposal.

2.2. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7 except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and maintained by AEMO in accordance with the NER, including NER 7.16.7.

2.3. The national electricity objective

Within the specific requirements of the NER applicable to this Proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (NEO) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system.

3. Proposal discussion

3.1.1. MSATS Procedure – MDM Procedure

In conjunction with the NEM2025 Implementation Forum, AEMO has proposed the new report (RM51) that will provide SAPS Generators with the data AEMO used to calculate their share of the generation on a SAPS. The SAPS rule requires AEMO to determine the total amount of energy supplied to a SAPS by summing the metering data for each of the SAPS End User NMIs in each trading interval. The RM51 will allow the SAPS generators to see how the total load was calculated, as well as their share of the generation for the SAPS in the circumstance where there is more than one generator on a SAPS.

AEMO is also taking the opportunity, while consulting on the MDM Procedure, to update the descriptions for the RM43 and RM46 reports. These changes are for clarity. They are not intended to change the meaning of the descriptions. The underlying reports are unchanged.

3.1.2. Metering Provider Services Service Level Procedure

On 3 November 2022, AEMO published:

- AEMO’s Final Report on Standalone Power Systems (SAPS) – Identifying a SAPS NMI in MSATS.
- The related MP SLP, as version 1.5, with the effective date of 30 May 2023.

However, on 7 December 2020, AEMO had published:

- AEMO’s Final Report on the 2020 Metering ICF Package.
- Related Service Level Procedure – Metering Provider Services (“**ICF MP SLP**”), also as version 1.5, with the effective date of 1 May 2022

Accordingly, to maintain consistency with the ICF MP SLP:

- The MP SLP is version 1.6.
- The version history in the MP SLP includes the following two rows.

Version	Effective Date	Summary of Changes
1.5	1 May 2022	Updated to include changes for the Metering ICF Package 2020 consultation, the changes are for the following Information Change Requests (ICFs): <ul style="list-style-type: none"> • ICF_020 Changes to the clause 4.2 of the SLP to avoid confusion with the terms validation vs verification
1.6	30 May 2023	Updated to incorporate National Electricity Amendment (Regulated stand-alone power systems) Rule 2022

3.1.3. Metering Data Provider Services Service Level Procedure

AEMO’s Final Report sets out the preferred option to resolve the conversion of non-5-minute metering data (**Preferred Option**).

The Preferred Option involves the following roles and responsibilities:

- MDPs which operate in SAPS would provide metering data to participants as required for NMIs not connected to SAPS (as MDPs do currently, so no new requirements for MDPs) (**MDP Existing Requirement**).
- AEMO would convert non-5-minute metering data from SAPS End User connection points (including Type 6 metering data) into 5-minute data using flat calculation methods (for example, 30-minute interval value divided into 6 equal 5-minute intervals).

- AEMO would then calculate the settlement amount to be applied to the SAPS generation NMI(s) within each SAPS by aggregating SAPS End User energy values.

However, the MDP Existing Requirement is not reflected in version 2.3 of the MDP SLP, which was published with the Final Report.

Inadvertently, section 3.12.2 incorrectly purports to impose new requirements on MDPs (**MDP Incorrect Requirements**).

Questions

- Do you agree that the MDM Procedure should be amended to include the new report (RM51)?
- Do you agree that the descriptions for the RM43 and RM46 should be updated in the MDM Procedure?
- Do you agree with the proposal to amend the version of the MP SLP to 1.6?
- Do you agree with the proposal to amend the MDP SLP to reflect the preferred option to resolve the conversion of non-5-minute metering data as set out in the AEMO Final Report?
- Do you have any other comments that you would wish to make?

3.2. How the proposal meets the objectives

The proposal outlined in this draft report is necessary to:

- Provide necessary settlement information to SAPS generators (RM51).
- Provide clarity on the use of certain MSATS reports (RM 43 and RM46).
- Correct an inconsistency between the in the approach described in the final determination and the subsequent downstream procedures.
- Correct the version number (and version history table) of a Procedure.

AEMO considers that the amendment proposal is a Non-material Proposal because it will be unlikely to have a significant impact on the NEM or on the activities of the related Registered Participants (NER 8.9.1(a)), including:

- Investment or operational decisions in the market (e.g. arising from information provision requirements on industry, including information quantity, nature, detail, timing, etc).
- The costs of participating in the market or complying with the market requirements (e.g. arising from changes in how participants are required to provide their services or operate or the availability of information).

4. Draft determination

4.1. Draft determination

AEMO has prepared a draft of amendments to the following procedures reflecting the Proposal, as published with this draft report in mark-up format from the current version.

AEMO's draft determination is to make the changes in that form.

4.2. Effective date

AEMO's proposed effective date for the determination is **30 May 2023**.