STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 6 April 2022

Table of Contents

1. Context

This template is to assist stakeholders in giving feedback about the options detailed in the issues paper associated with the Standalone Power Systems consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

2. Questions

Section	Description	Participant Comments
3.3.2	Are there other advantages/disadvantages of any of the options that AEMO should have considered?	Any option selected must: 1. Allow for both the supply NMI and customer NMIs to be easily identified by Participants via NMI discovery in MSATS. This is to ensure that the appropriate products and services are offered to SAPS consumers by Retailers and that they can be appropriately managed within the greater pool of grid connected NMIs. Equally it is to ensure that products, services and obligations that may impact customers can be managed. As these customers are not Grid connected, retailers would not want to enrol them in Demand Response programs, VPP programs, Solar curtailment, load shedding programs etc.

Section	Description	Participant Comments
		Also, as there is greater understanding of how SAPS systems operate physically, the market may want new tariffs, for example which discourage overnight demand, rather than encourage this demand. Thus, it will be critical that these customers are easily identified so they can be appropriately managed and located.
		2. Preferably the Supply NMIs should have a specific 'SAPS' NMI Classification to ensure these NMIs are readily identifiable as supply NMIs and protect them from accidental NMI transfer. AGL notes that the GENERATR classification could be used, but strongly urges a SAPS identifier be created to ensure these supplies are clearly and separately identified from Grid connected generators and because different Settlement processes are used for these supplies.
		Accidental NMI transfer can occur when customers provide adjacent – but incorrect NMIs. Therefore, a specific NMI classification can be used to enable validations and assist in managing market functions.
		3. The implementation of these SAPS identifiers should not impact any supporting services, such as meter data file provision. MDM changes are not required for generators, so it is unclear why AEMO has indicated that the implementation of a SAPS Identifier would require secondary changes to MDM files.
		4. While a simple administered wholesale price for all SAPS within a region is proposed, AGL – who is currently working closely with Western Power (WA) on their SAPS Program – does consider that different wholesale prices may be required over time. As such, the

Section	Description	Participant Comments
		ability to individually identify SAPS devices (by region, by network) seems the most prudent option.
3.3.2	Is there another option for identifying a SAPS NMI that AEMO should consider? Why?	One option which was raised was to use a specific sub-set of NMIs purely for SAPS connections – however, AGL considers that this may be difficult to implement, and would require a secondary table to identify a SAPS connection..
3.3.2	Which of the three options for identifying a SAPS NMI do you prefer and why?	Option 3 is recommended as this allows the opportunity to develop and install flexibility and further granular information in the Identifier coding. AGL believes that given the likely expansion of SAPS devices and potential changes which may occur over time, it is prudent to establish a strong identifier at the start of the program, rather than be forced to undertake a rectification program in a few years. Noting the likely growth and changes associated with SAPS and the likely need to identify both the SAPS Supply and SAPS customers, AGL supports - Option 3 - the SAPS Identifier and - proposes a **new** MSATS NMI Classification of 'SAPS' for the Supply NMI (like the GENERATR NMI classification). A proposed format for a SAPS Identifier might be:

Section	Description	Participant Comments
		An example layout is shown below.

3. Other Issues Related to Consultation Subject Matter

Participant Comments
1. SAPS Supply metering will be 5ms (new connection) and therefore the customer metering is expected to all be at 5ms as the SAPS loads must balance in settlements. It seems that all loads must be metered at 5ms to remove any potential profiling issues/ settlement discrepancies as SAPS loads must balance. Noting that the implementation of a SAPS Supply is being driven by the DB, AGL would propose that the DB pay for any customer metering changes required to convert the customer metering to 5ms as the result of implementing a SAPS. 2. AGL understands that supporting this option requires a schema change, but notes that there are already other industry changes in train requiring a schema release, and believes that this change can therefore be accommodated within one of those releases, making the costs incremental.