

# STANDALONE POWER SYSTEMS

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Ausgrid

***Submission Date:*** 6/4/22

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## 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?	One potential issue with option 2, Ausgrid would like to highlight is the individual allocation of a unique TNI code for each SAPS. As the first letter designates the jurisdiction (ie. N for NSW), that only leaves 3 characters for the SAPS and if AEMO suggests that the second character should be 'S' for SAPS this only leave 2 characters and what of the existing TNI that already use 'S' as second letter such as NSYS, NSBY. As there are already 296 TNIs allocated to NSW, will there be sufficient number of TNIs for a potential few thousand SAPS, noting that new TNIs for transmission nodes and generators are being added constantly and we assume that old TNI codes could not be used.
3.3.2	Is there another option for identifying a SAPS NMI that AEMO should consider? Why?	As discussed in the March workshop, Ausgrid would like to re- suggest the use of a NMI classification of SAPS and the Type 7 methodology for AEMO to consider. We believe the workshop did not adequately discuss these options in full.

Section	Description	Participant Comments
		<p>AEMO suggested that each NMI must be uniquely identifiable as as SAPS, with 1 SAPS TNI code per network, a NMI classification of SAPS and a unique NMI per SAPS and an allocated FRMP, why would this not provide AEMO with enough Information to flag and appropriately “treat” the SAPS metering data for settlement.</p> <p>Ausgrid also highlighted the Type 7 model which may also be able to be used for SAPS. In Ausgrid’s network we have 3 Virtual TNIs for Type 7 and NONCONUML NMIs whilst it is a one NMI to multiple connection point method, can the framework be used for SAPS. In the Type 7 framework we have multiple NMIs for council public lighting which can be with any FRMP the customer chooses. The Metering data is adequately split and settled in the NEM using this methodology. Again a SAPS TNI is allocated per network area, each SAPS will have its own unique NMI. In the work shop AEMO stated that the SAPS must be individually identifiable per SAPS per FRMP.</p>
3.3.2	Which of the three options for identifying a SAPS NMI do you prefer and why?	<p>Ausgrid supports Option 2 as this will not require a schema update, and for the total number of SAPS NMIs proposed to be connected in the NEM does not seems financially viable to put AEMO and all participants in the NEM through a schema change for such a small number of NMIs. Ausgrid suggests a cost benefit analysis to support a schema change is conducted if one of these options is preferred.</p>

### 3. Other Issues Related to Consultation Subject Matter

#### Participant Comments

Ausgrid requests AEMO provide a summary including a diagram of how AEMO propose to settle SAPS in the NEM for general education and to assist in the debate about which methods are viable and can be discounted. Ausgrid does not believe that until this is understood by participants can an appropriate identification method be determined by industry.

When creating TNIs for SAPS will AEMO need to do any calculation for MLF? Normally the Network need to provide information to AEMO to allow for this clcualtion such as cable/transformer impedances, annual load forecast for the TNI etc. Provision of this information by the network and the calculation by AEMO would be an extremely tedious process.

Has AEMO determined other standing data to be applied to SAPS NMIs, such as DLF, is it applicable and what figure should it be? Would the DLF be a standard DLF for all SAPS NMIs?