

6 April 2022



Mr Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator
GPO Box 2008
MELBOURNE VIC 3001

NEM.Retailprocedureconsultations@aemo.com.au

Dear Mr Westerman

Standalone Power Systems (SAPS) – Identifying a SAPS NMI in MSATS

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to its issues paper *Identifying a SAPS NMI in MSATS*.

This submission is provided by Energy Queensland, on behalf of its related entities:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited;
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail); and
- Affiliated contestable business, Yurika Pty Ltd and its subsidiaries, including Yurika Metering.

Energy Queensland's responses to questions raised in the issues paper are provided in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this response, please contact me.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin".

Charmain Martin
Acting Manager Regulation

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Encl: Energy Queensland response to consultation questions

STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Energy Queensland

Submission Date: 6 April 2022

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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? | Energy Queensland notes that given the likely significant administrative burden of this change, particularly in relation to individual SAPS, that this may incentivise individual SAPS to leave the NEM, with only SAPS microgrids to remain. Should this occur, the industry would likely need to identify NMIs departing the NEM. AEMO may need to consider a solution, such as a new NMI classification (e.g. “S” code) and an end date of market role relationships. |
| 3.3.2 | Is there another option for identifying a SAPS NMI that AEMO should consider? Why? | Energy Queensland considers that there is value in a new SAPS jurisdiction that mimics Queensland’s existing “ISO” jurisdiction that enables the identification of non-NEM connections. Energy Queensland is available to meet with AEMO representatives to discuss this approach further. |
| 3.3.2 | Which of the three options for identifying a SAPS NMI do you prefer and why? | Energy Queensland acknowledges the need to easily identify a SAPS NMI. |

| Section | Description | Participant Comments |
|---------|-------------|--|
| | | <p>Of the three options presented in the issues paper, Energy Queensland prefers Option 2 – TNI code with special convention/format for SAPS TNI codes.</p> <p>We note that if a special convention/format of the TNI field does not involve a schema change, there will be fewer impacts on internal systems and will reduce costs by reducing the need for coding changes and testing.</p> <p>We also consider that there may be value in an additional SAPS ID field, in conjunction with Option 2 (i.e. not as a stand-alone solution). However, it may be up to participants to create SAPS flags internally based on the new TNIs.</p> |

3. Other Issues Related to Consultation Subject Matter

| Participant Comments |
|----------------------|
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