

# Integrated Energy Storage Systems

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant: AusNet***

***Submission Date: 3 April 2023***

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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 Integrated Energy Storage 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. Consultation questions

### *NMI Classification Code amendments*

Question	Participant Comments
<p>1. Do you agree that the proposed new NCCs address the requirements for compliance with the IESS Rule outlined by AEMO? If not, please specify your reasoning and any alternative options relevant to the IESS rule.</p>	<p>AusNet understands the need to establish the TIRS, DIRS and NREG new NMI Classification Codes. These codes are structural changes to the market and are required to properly implement the IESS Rule change. In the long run, there implementation will be beneficial.</p> <p>However, we do not agree with the new code DGENRATR and consequently the amendments to GENERATR. The amending Rule does not all mention updating MSATS or NEM procedures to identify the new types of generators established in the Rule. Therefore, each change needs to be justified by business process benefits. We consider registered generators are not subject at either the distribution or transmission levels \to mass market commercial activity – the type facilitated by MSATS. The information as to whether they are distribution or transmission connected can be otherwise easily derived by AEMO from network topography and other standing data. Implementing this change would require time-consuming manual work and system configuration changes for which the costs would likely outweigh the benefit. Additionally, it is sometimes difficult to distinguish these generators based on:</p> <ul style="list-style-type: none"> <li>- different jurisdictional voltage thresholds to be transmission assets; and</li> </ul>

	<p>- complicated special site metering, under NER clause 7.8.12.</p> <p>Although the amending Rule treats transmission and distribution connected assets differently as to their connection and network tariff processes, this should not affect the market processes associated with MSATS. Therefore, the new code DGENERATR and the amendments to GENERATR are not required.</p>
<p>2. Are there any gaps or issues with the proposed NCC definitions as they relate to the IESS Rule, noting that issues beyond the scope of the IESS Rule will be dealt with through separate processes?</p>	<p>AusNet considers the proposed NCC definitions changes are too extensive already and there are there no gaps as they relate to the IESS Rule.</p>
<p>3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from AEMO to understand the impact of the proposed changes?</p>	<p>As discussed above, TIRS, DIRS and NREG are required to properly implement the IESS Rule change, however the new code DGENERATR and consequently the amendments to GENERATR are not necessary or justified.</p> <p>Each distribution and metering business will need to update their systems and processes which comes at a cost to all consumers and should therefore be assessed against the benefit to consumers.</p>

### ***Amendments to terminology***

<b>Question</b>	<b>Participant Comments</b>
<p>4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?</p>	<p>AusNet considers that the proposed changes are required to implement the IESS rule change, all except the definition of non-scheduled load. Although the term is used in the amending Rule, it is not relevant to market procedures, like MSATS.</p>

<p>5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?</p>	<p>We consider that the costs of a formal readiness program for these changes are not warranted. Normal market and commercial pressures will provide adequate incentives for registered participants to be compliant with the Rule changes. Any failure to comply with the rules will appropriately be at the risk of the market participant.</p>
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**Other matters - ICF\_070 Increase ‘Building Name’ Field Length in MSATS**

<p><b>Question</b></p>	<p><b>Participant Comments</b></p>
<p>6. Do you agree with the proposed change to increase the ‘Building Name’ field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document? If not, please specify your reasoning.</p>	<p>AusNet does not support change to increase the length of the rom 30 characters to 60 characters for “building or property names”. This is a costly IT change to our systems. Current processes truncate the “building or property names” field at 30 characters – a length that should be able to identify any building or property name. Therefore, we consider that the change to 60 characters is unwarranted and should not proceed.</p>

**Other matters - ICF\_059 CATS clarifications plus NMI Classification Review**

<p><b>Question</b></p>	<p><b>Participant Comments</b></p>
<p>7. Do you agree that Option 1 would most effectively and efficiently resolve the issue of NEM Participants not being able to easily and accurately identify a customer’s non-registered or non-classified generation capabilities? If no, please specify your reasoning.</p>	<p>AusNet considers the addition of new NCCs would be the costliest option to implement, because it requires substantive changes to market service systems and other changes to core management systems used by LNSPs to register connection points and create network connection asset data. This in fact is more costly to implement than a new field in MSATS – an option we also consider to be sub-optimal in comparison to option 3, which if shared by AEMO would be the lowest cost and most effective solution.</p> <p>In the AEMC’s rule change consultation establishing the DER register, the question of providing DER register information to retailers was assessed. The “register of distributed energy resources” rule determination concluded that the data could not be shared with retailers, in saying:</p>

	<p>“The Commission considers that there is not a strong case that allowing these parties access to the register would enhance the safety or operation of the national electricity market. Further, it is not appropriate for parties to have access to protected information for commercial purposes. For that reason, the Commission does not recommend that Registered Participants other than NSPs have access to disaggregated information contained in the DER register.”</p> <p>We do not consider it appropriate or necessary for AEMO to re-litigate, or change the meaning of, the rule change determination as part of this process. Any changes to the rules should undergo the appropriate formal rule change process by the AEMC (and including comprehensive stakeholder consultation).</p> <p>We are concerned that none of the options presented in the ICF adhere to the principles established in the rule determination. The AEMC’s final determination on the register of DER stated in relation to privacy concerns by stakeholders that:</p> <p>“it is not appropriate for parties to have access to protected information for commercial purposes”.</p> <p>Therefore, we do not support the proposed changes in ICF_059.</p>
<p>8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.</p>	<p>Option 3 would be the better alternative, if AEMO were to share their extensive DER register data resources (or subset thereof) with the registered FRMP. In order to satisfy privacy concerns limiting the data subset would be appropriate.</p>
<p>9. Do you agree that the creation of a new NCC to identify Standalone EV Charging Stations would add value to the market? If no, please specify your reasoning.</p>	<p>AusNet does not support to the creation of a new NCC to identify Standalone EV Charging Stations. There is no amending Rule that requires different treatment for Standalone EV Charging Stations. There may be in the future as the ESB consultation paper progresses to a Rule change proposal. Expectation of future Rule requirements is not justification for a procedure change and runs the risk of making changes that conflict with any future amending Rule on Standalone EV Charging Stations, and hence resulting in higher costs to implement than prudent or necessary.</p>

<p>10. Do you agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS? If not, please specify your reasoning.</p>	<p>Additionally, the characteristics of EV Charging are similar to any other commercial and industrial customer. They can be small with a single intermittently used to very large with more than a dozen charges. The amount of work required to make system and process changes associated with this new NCC would not be beneficial or justified, at least, not until there is an amending Rule.</p> <p>We note that jurisdictional differences are long standing, they can be complex and subtle in their effect on customer obligations. Given the market has operated for two decades already without referencing these jurisdictional differences, we do not understand the need to make this change now, particularly given the likely costs implications of the change. If this change were to be considered it should be supported by a written explanation on the differences in the jurisdictional laws. This level of detail was not provided, and neither was a cost benefit justification of the change. Therefore, we do not support the referencing of these jurisdiction codes.</p>
<p>11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.</p>	

### 3. Procedure Drafting Changes

#### *Retail electricity market procedures – Glossary and Framework*

Section	Description	Participant Comments
Figure 1	Modify diagram to represent bi-directional flows of energy instead of uni-directional flows	

Metering Procedure Changes

2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	AusNet agrees this change is consistent with the amending IESS Rule.
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	AusNet agrees this change is consistent with the amending IESS Rule.
Glossary	<p>Remove the following terms:</p> <ul style="list-style-type: none"> <li>• First Tier NMI</li> <li>• First Tier Load</li> <li>• Second Tier NMI</li> <li>• Second Tier Load</li> <li>• Tier 1 Site</li> <li>• Tier 2 Site</li> </ul> <p>Include the following term:</p> <ul style="list-style-type: none"> <li>• Financially Responsible</li> </ul> <p>Add <i>Integrated Resource Provider</i> to the definition of FRMP</p>	AusNet agrees this change is consistent with the amending IESS Rule.

**MSATS CATS**

Section	Description	Participant Comments
<p>2.2 Financially responsible market participant</p>	<p>Part (d) Delete 'Ensure that only small generating unit connection points are assigned to the relevant MSGA' and replace with 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'  Delete sections (i) and (j) and replace with:  'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule.</p>
<p>2.9 Demand Response Service Provider</p>	<p>Include NREG as an NMI Classification that a DRSP can be assigned to.</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule</p>
<p>Table 4-A-Change Reason Codes</p>	<p>Include TIRS and DGENERATR as part of Note (1)</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule.</p>
<p>4.5 NMI Classification</p>	<p>Include the new classification codes for DGENERATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENERATR and amendments to GENERATR for reasons discussed above.</p>

Section	Description	Participant Comments
Table 4-H-Datastream Status Codes	Remove reference to second tier retailer Part (d) If a retailer transfer CR is Completed the Datastream Status Code must be 'A' when the NMI is energised.	AusNet agrees this change is consistent with the amending IESS Rule.
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENERATR in reference to "not SMALL"	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENERATR and amendments to GENERATR for reasons discussed above.
15.2.3 Requesting Participant Requirements	Remove the following field as a selection option from the BCT: The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	AusNet agrees this change is consistent with the amending IESS Rule.

### MSATS WIGS

New NCCs are proposed to be included in the Condition Precedent component of the Wholesale, Interconnector, Generator and Sample (WIGS) procedure. The existing system constraints are unchanged for each participant requirement, timeframe and objection for each change request submitted.

Change Request type	Section	Conditions Precedent	Participant Comment
Change Retailer	2.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENERATR, GENERATR, NREG or DWHOLSAL	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENERATR and amendments to GENERATR for reasons discussed above.

Metering Procedure Changes

Change Request type	Section	Conditions Precedent	Participant Comment
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
N – New Role, C – Current Role, Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Create NMI, Metering Installation Details and NMI Datastream	4.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of

Metering Procedure Changes

Change Request type	Section	Conditions Precedent	Participant Comment
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	DGENRATR and amendments to GENERATR for reasons discussed above. AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Create and Maintain Datastream – Change Requests	6.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.

Metering Procedure Changes

Change Request type	Section	Conditions Precedent	Participant Comment
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
Change MPB or MPC or Both	8.6.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of

Metering Procedure Changes

Change Request type	Section	Conditions Precedent	Participant Comment
			DGENERATR and amendments to GENERATR for reasons discussed above.

Section	Description	Participant Comments
9.2.3	Remove the following field as a selection option from the BCT:  The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	AusNet agrees this change is consistent with the amending IESS Rule.

**Metrology Procedure Part A**

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	AusNet agrees this change is consistent with the amending IESS Rule.
3.5	Remove reference to 'first tier load'	AusNet agrees this change is consistent with the amending IESS Rule.
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	AusNet agrees this change is consistent with the amending IESS Rule.
12.8.2	Remove reference to 'first tier controlled load' and 'second tier controlled load' and include market customer. In 12.8.2 Load Profiling (a) and	AusNet agrees this change is consistent with the amending IESS Rule.

Section	Description	Participant Comments
	remove first tier from 12.8.2 Load Profiling (b) and include market customer.	

**Metrology Procedure Part B**

Section	Description	Participant Comments
10.3	<p>Bi-directional units may have multiple sources of generation and load behind the connection point. For sites that are scheduled units, AEMO provides SCADA data for generating units. Validation of metering data for connection points where SCADA is made available includes NCCs of DGENRATR and Small Resource Aggregator.</p> <p>New clause to reference bi-directional units where validation should occur for SCADA data suffixes of E and B channel data.</p>	
12.3	<p>Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule.</p>
13.1	<p>Change all references in section 13.1 from Market Load to Market Connection Point</p>	<p>AusNet agrees this change is consistent with the amending IESS Rule.</p>
13.5	<p>Change reference from 'market load' to <i>market connection point</i></p>	<p>AusNet agrees this change is consistent with the amending IESS Rule.</p>

### **Standing Data for MSATS**

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	AusNet agrees this change is consistent with the amending IESS Rule.

### **MSATS MDM Procedures**

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	AusNet agrees this change is consistent with the amending IESS Rule.

### **Exemption Procedure Data Storage Requirements**

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
2.1	Remove reference to <i>transmission connection point</i> and <i>distribution connection point</i> where the FRMP is a <i>Market Generator</i> or <i>Market Small Generation Aggregator</i> to reflect the Rule Change 7.8.2(b1).	AusNet agrees this change is consistent with the amending IESS Rule.

**Guide to the Role of the Metering Coordinator**

Section	Description	Participant Comments
4.1	Remove small generating units and market generating units and include non-market bidirectional units and small resource connection point.	AusNet agrees this change is consistent with the amending IESS Rule.

**Service Level Procedure: Embedded Network Manager**

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	AusNet does not agree with this change, for the reasons discussed earlier in this submission.

**Service Level Procedure: MDP Services**

Section	Description	Participant Comments
3.13	Include new NCCs of XBOUNDRY, BULK, DGENERATR, DIRS and TIRS for connection points required to provide 90% of complete actual metering data by 8am for the day(s) specified for prudential purposes.	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENERATR and amendments to GENERATR for reasons discussed above..

***MATS Procedures: National Metering Identifier***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
Appendix E	Removal of current illustrations and tables of Appendix E	

***Metering Data Provision Procedures***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
4.3	Include a new energy flow type that reflects the purpose of the rule change to include bidirectional energy flows for generation connection points.	AusNet agrees this change is consistent with the amending IESS Rule.