

# Integrated Energy Storage Systems

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Jemena

***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
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.	Yes.
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?	No.
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	Jemena will need to complete some system configuration changes and will raise any points for clarification during scoping stage. No further information required from AEMO at this point.

AEMO to understand the impact of the proposed changes?	
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***Amendments to terminology***

<b>Question</b>	<b>Participant Comments</b>
4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?	No.
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	No comment.

***Other matters - ICF\_070 Increase 'Building Name' Field Length in MSATS***

<b>Question</b>	<b>Participant Comments</b>
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.	Agreed.

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

<b>Question</b>	<b>Participant Comments</b>
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<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>Jemena does not support this change at this time.</p> <p>Jemena agrees that NMI classifications need to become more granular, however, this needs to be scoped and implemented in the context of target state for NEM2025.</p> <p>There is a lack of value in introducing this NMI classification at this time and believes that adequate workaround for participants is in place via the DER register. There is opportunity to review participants’ access to this register and placing more robust and uniform requirements for the updating of data to this register.</p> <p>The major concern is that making this change in advance of the NEM2025 initiatives will incur a very high likelihood of additional effort and expense to refactor the changes at a later point.</p> <ul style="list-style-type: none"> <li>• Changing SMALL/LARGE has significant downstream implications to procedures and rules. This would need to be thoroughly analysed.</li> <li>• Potential for duplication and misalignment of information between DER register and CATs</li> <li>• Complexity- changing a single field to have multiple purposes</li> <li>• There are alternate ways to access the information – e.g. via onboarding</li> </ul> <p>There should be a regulatory driver for this change and where is the value add vs. cost associated with rework when NEM 25 landscape/requirements becomes clearer.</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>As above, interim solution is to provide access to the DER register and manage updates to the register so that it stays up to date.</p>
<p>9. Do you agree that the creation of a new NCC to identify Standalone EV Charging Stations would</p>	<p>No. As above in feedback to question 7.</p>

add value to the market? If no, please specify your reasoning.	
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.	Agreed.
11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	Please see feedback to question 7.

### 3. Procedure Drafting Changes

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

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
Figure 1	Modify diagram to represent bi-directional flows of energy instead of uni-directional flows	No concerns.
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	No concerns.
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	No concerns.
Glossary	Remove the following terms: <ul style="list-style-type: none"> <li>• First Tier NMI</li> </ul>	No concerns.

	<ul style="list-style-type: none"> <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>	
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### MSATS CATS

Section	Description	Participant Comments
2.2 Financially responsible market participant	<p>Part (d)</p> <p>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'</p> <p>Delete sections (i) and (j) and replace with:</p> <p>'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'</p>	No concerns.

Section	Description	Participant Comments
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	No concerns.
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	No concerns.
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	No concerns.
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.	No concerns.
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	No concerns.
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)	No concerns.

## 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, DGENRATR, GENERATR, NREG or DWHOLSAL	No concerns.
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	No concerns.
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	No concerns.
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No concerns.
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	No concerns.
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	No concerns.
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No concerns.
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No concerns.
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No concerns.
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	No concerns.

Change Request type	Section	Conditions Precedent	Participant Comment
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	No concerns.
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	No concerns.
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No concerns.
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	No concerns.
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	No concerns.
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.
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	No concerns.
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	No concerns.

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)	No concerns.

***Metrology Procedure Part A***

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	No concerns.
3.5	Remove reference to 'first tier load'	No concerns.
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	No concerns.
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 remove first tier from 12.8.2 Load Profiling (b) and include market customer.	No concerns.

***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>	No concerns.
12.3	<p>Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.</p>	No concerns.
13.1	<p>Change all references in section 13.1 from Market Load to Market Connection Point</p>	No concerns.
13.5	<p>Change reference from 'market load' to <i>market connection point</i></p>	No concerns.

### ***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'.	No concerns.

### ***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> .	No concerns.

### ***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).	No concerns.

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

Section	Description	Participant Comments
4.1	Remove <i>small generating units and market generating units</i> and include <i>non-market bidirectional units and small resource connection point</i> .	No concerns.

**Service Level Procedure: Embedded Network Manager**

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	No concerns.

**Service Level Procedure: MDP Services**

Section	Description	Participant Comments
3.13	Include new NCCs of XBOUNDRY, BULK, DGENRATR, 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.	No concerns.

***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	No concerns.  Will the table be updated with a newer version or remain deleted?

***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.	No concerns.