Integrated Energy Storage Systems

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: *Telstra Energy*

Submission Date: *3rd April 2023*

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 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.	Telstra Energy agree the proposed new NCC's appear to address the requirements for compliance with the IESS rule outlined by AEMO. Telstra Energy do note that the new DIRS and TIRS codes do not distinguish between Large and Small consumption levels and which may lead to difficulty in achieving small customer compliance across various regulatory instruments and obligations.
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?	As addressed in Question 1 (above), Telstra Energy note that the new DIRS and TIRS codes do not distinguish between Large and Small consumption levels and which may lead to difficulty in achieving small customer compliance across various regulatory instruments and obligations.
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	Telstra Energy are generally comfortable with the likely system impact of the new NCC's, however, Telstra Energy expect to achieve achieve greater clarity upon MSATS 49.0

General

| AEMO to understand the impact of the proposed changes? | Technical Specification (or equivalent artefact) is fully updated to reflect proposed changes. |

Amendments to terminology

Question	Participant Comments
4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?	No comment
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	Given that the IESS change is optional for particpants who wish to participate, Telstra Energy do not believe an industry wide readiness programme is necessary at this time.

Other matters - ICF_070 Increase 'Building Name' Field Length in MSATS

Question	Participant Comments
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.	Telstra Energy support 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 to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document.

Other matters - ICF_059 CATS clarifications plus NMI Classification Review

Question	Participant Comments

General

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.	As a proponent of Option 1, Telstra Energy are supportive of Option 1. Telstra Energy note Options 2 and 3 may also have benefits and are worthy of further investigation however could result in significant costs and delays. Telstra Energy encourage the adoption of Option 1 as a first step to addressing the issue of NEM particpants being able to accurately identify a customer's non-registered or non-classified generation capabilities.
8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.	As stated in Question 7, Telstra Energy would not be adverse to continued exploration of Options 2 & 3 as the market develops.
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.	As a proponent of a new NCC to identify standalone EV Charging stations, Telstra Energy recognise this new NCC will assist in identifying these connection points with significantly different usage characteristics. Due to the imminent rollout of a significant number of EV charging stations, Telstra Energy suggest this new NCC should be implemented without delay.
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.	Telstra Energy agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS.
11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.	Telstra Energy encourage AEMO to adopt a change date which is achievable by the industry whilst promptly addressing current issues. Given that the IESS NCC changes are proposed to be undertaken in May 2023, there is logic in including all similar changes in the same release. However, it maybe appropriate for AEMO to consider some sort of compliance holiday to mimimuse unnecessary industry burden.

General

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	
2.6.2	Include *integrated resource systems* as a term that is included in the WIGS Procedures	
4.1.2	Remove *market loads* and replace with *market connection points*	
Glossary	Remove the following terms: • First Tier NMI • First Tier Load • Second Tier NMI • Second Tier Load • Tier 1 Site • Tier 2 Site Include the following term: • Financially Responsible Add *Integrated Resource Provider* to the definition of FRMP	

General

MSATS CATS

Section	Description	Participant Comments
2.2 Financially responsible market participant	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'	
2.9 Demand Response Service Provider	Include NREG as an NMI Classification that a DRSP can be assigned to.	
Table 4-A-Change Reason Codes	Include TIRS and DGENERATR as part of Note (1)	
4.5 NMI Classification	Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG	

General

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.	
6.2 Error Corrections	Footnote 8. Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	
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)	

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	
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	

General

Change Request type	Section	Conditions Precedent	Participant Comment
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	
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	
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
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	
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	

General

Change Request type	Section	Conditions Precedent	Participant Comment
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
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	
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	

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)	

General

Metrology Procedure Part A

Section	Description	Participant Comments
3.4	Remove reference to 'first tier load'	
3.5	Remove reference to 'first tier load'	
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	
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.	

Metrology Procedure Part B

Section	Description	Participant Comments
10.3	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	

General

Section	Description	Participant Comments
	where SCADA is made available includes NCCs of DGENRATR and Small Resource Aggregator. New clause to reference bi-directional units where validation should occur for SCADA data suffixes of E and B channel data.	
12.3	Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.	
13.1	Change all references in section 13.1 from Market Load to Market Connection Point	
13.5	Change reference from 'market load' to *market connection point*	

Standing Data for MSATS

Section	Description	Participant Comments
3.2	Include new NCCs and remove reference to 'Small Generation Aggregator'.	

General

MSATS MDM Procedures

Section	Description	Participant Comments
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with *distribution connected unit.*	

Exemption Procedure Data Storage Requirements

Section	Description	Participant Comments
2.1	Remove reference to *transmission connection point* and *distribution connection point* where the FRMP is a *Market Generator* or *Market Small Generation Aggregator* to reflect the Rule Change 7.8.2(b1).	

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.*	

General

Service Level Procedure: Embedded Network Manager

Section	Description	Participant Comments
4.2.4	Include the new NMI classification of DGENERATR	

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.	

MATS Procedures: National Metering Identifier

Section	Description	Participant Comments
Appendix E	Removal of current illustrations and tables of Appendix E	

General

Metering Data Provision Procedures

Section	Description	Participant Comments
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.	

General