Load Profiling Methodologies

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

***Participant**: Red Energy and Lumo Energy*

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1. Context

This template is to assist stakeholders in giving feedback on the content of the initial draft version of the *Load Profiling Methodologies*.

2. Feedback on Load Profiling Objectives and Principles

Question	Participant Comments
1. Do you agree with the proposed objectives and principles?	Red Energy and Lumo Energy (Red and Lumo) agree with the proposed objectives and principles.
2. Are there any other objectives and principles you believe should be considered?	Red and Lumo propose for the following: - The impact of the profiles on the settled volumes (and pool prices) should be proportionate or representative of the expected settled volumes. - Manage the need to ensure daily loads down to interval loads are clean - Ensure there are no impacts to net generation at a site level. - Daily net generation sites should not have an inverted consumption/generation profile.

3. Feedback on Load Profiling Methodologies

Question	Participant Comments
1. Which methodology do you consider would best achieve the objectives and principles? Why?	Red and Lumo are still in process of analysing and reviewing the options provided with our own portfolio & historical data to date. We are currently not in a position to commit our support for one of the proposed methodologies. At this stage, we do not support options 1 or 6 as viable options. For option 1, the problem trying to be mitigated occurs over too many days for it to be useful, and option 6 is not beneficial for sites with net generation which would be adversely impacted.
2. Do you consider that an alternative methodology would better achieve the objectives and principles? Please note that the selection of an alternative methodology would likely result in a delay to the longer-term methodology being implemented, as AEMO would need to develop, analysis and test this alternative.	Red and Lumo do not have a proposed alternative methodology.
3. Do you believe the preferred methodology should be applied to both 5MLPs and NSLPs where the observed conditions have been met? If no, why?	
4. When do you consider the preferred methodology should be implemented? On 30 May 2023?	Red and Lumo are okay with this date.

4. Other Issues Related to the Load Profiling Methodologies and Other Matters

Stakeholders to provide details of other Load Profiling Methodologies related aspects that have not been included in the issues paper and provide details.

Participant Comments
We currently receive the net system load profile in terms of volumes, and undertake a calculation to work out the % per day day - an activity which each participant would need to do themselves. Given AEMO are likely to change profiling in future, we would like to propose that it would be good for AEMO to provide that proportion themselves. This would reduce the need for participants to change their codes to calculate the proportion themselves. This would be in addition to the volumes being provided by AEMO and not in replacement to.

5. Feedback on proposed Other Matters

Question	Participant Comments
1. Do you agree that the proposed amendments associated with obtaining and applying embedded network codes provide for the correct interpretation of the procedures, as well as achieving industry objectives? If no, then please provide a better alternative.	-

Question	Participant Comments
2. Do you agree that the inclusion of the 'House Number To Suffix' element enables a better quality site address to be recorded for energy participants? If not, please specify your reasoning.	Red and Lumo agree with the proposal.
3. Do you agree with the proposal to removal of the current NMI Discovery Type 3 validation? If not, please specify your reasoning.	-