UFE Reporting Guidelines

FIRST STAGE CONSULTATION PARTICIPANT RESPONSE TEMPLATE

Participant: Alinta Energy

Submission Date: 7 October 2022

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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 *UFE reporting guidelines* that will form the basis of UFE Trends Reports in accordance with NER 3.15.5B.

2. Questions

Section	Description	Participant Comments
1.1	Purpose and scope AEMO intends to publish each UFE Trends Report by 1 June each year covering a 12 month reporting period (For the (year "x") UFE Trends Report the reporting period is 1 May (year "x-1") to 30 April (year "x")). Q1. Do stakeholders require a different reporting timeframe? Q2. If so, what reporting timeframe is appropriate? What benefits will be realised through a different reporting timeframe?	Alinta Energy believes that until the data collated by AEMO is stabilised (over the next 24-36 months), quarterly reporting with monthly granularity of UFE would provide confidence to industry stakeholders in relation to data quality, given the significant fluctuations seen month to month is some local network areas since global settlement began its soft start in 2022.
2	Summary of analysis of UFE Charts in this section provide a summary of the UFE calculation components for each local area. The current proposal is to provide UFE component charts for the current reporting period based on FINAL version metering data.	Alinta Energy believes corresponding charts for the previous period be included. In particular local areas, Alinta Energy has encountered values of UFE that are volatile and do not seem consistent with losses that might be expected in those areas. A comparison over time would be of value to understand the historic and forecast exposure of market participants and the performance of

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	Q1. Should the corresponding charts for the previous reporting period also be included? If so, what benefits will be realised?	LNSPs in limiting losses and provide insights through trends.
3	UFE benchmark analysis AEMO proposes to publish the median, average, upper limit and lower limit UFE values as benchmarks for each local area per reporting period. Q1. Is there a better methodology to determine benchmarking for a *local area*? If so, provide details of that methodology.	This seems and appropriate approach.
4	UFE source analysis Areas of UFE source analysis are related to variables that modify metering data, as identified in section 4 of the Initial Draft *UFE reporting guidelines*. Q1. Are there other variables that modify metering data that should be included in the *UFE reporting guidelines*? If so, provide details of the other variables and their effect on metering data Q2. Should the importance/effect of these variables be ranked? If so, which variables should be analysed initially?	The scope of variables applied for UFE source analysis seem comprehensive. It is clear how solar PV is to be managed.
5	Recommendations – UFE visibility improvements Q1. What are the benefits in reporting UFE values at a more granular level than at the local area? Noting that reporting at TNI level is not meaningful for local areas that have virtual TNIs. Q2. Should the seasonal variance information	No comment.

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	be presented in another way? If so, how should this information be presented and what will be the benefits of presenting the information in this alternative way?	
6	Recommendations – UFE reduction actions Q1. Are there other actions which should be explored to reduce UFE? Q2. Who holds the information to support these actions?	LNSPs hold any additional information required along with data from third party Meter Data Providers and Metering Coordinators. The AER's price determination process provides incentives and should apply enforcement to ensure UFE reduces over time.
Appendix A.1	UFE analysis supporting information. Additional information to support UFE analysis in each local area. These charts are: • UFE for the local area • UFE for the local area as a percentage of local area ADME • UFE for the local area by metering data version, i.e. Prelim, Final, Rev 1 and Rev 2. Q1. Do the proposed charts, provide sufficient information, in conjunction with the charts in Section 2. to facilitate UFE analysis? Q2. If not, which other additional information is required? Provide details of other additional information required and the benefits of providing the additional information. Q3. Who holds the additional information?	We support the proposed UFE charts in Appendix A.1.

Section	Description	Participant Comments

3. Other Issues Related to the UFE Reporting Guidelines

Stakeholders to provide details of other UFE related aspects that have not been included in the proposed *UFE reporting guidelines* and provide details of the benefits of these additional reporting items.

Participant Comments
No further comments.