



Meridian Energy Australia Pty Ltd
Level 15, 357 Collins Street
Melbourne VIC 3000

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Australian Energy Market Operator
Level 37, 520 Collins Street
Melbourne VIC 3000

Reference: NEM.Retailprocedureconsultations@aemo.com.au

B2B Procedures Change Pack

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (MEA Group or Powershop) thanks the Australian Energy Market Operator (AEMO) for the opportunity to provide comments on AEMO's B2B Procedures Change Pack Consultation Paper (the Paper).

Background on the MEA Group

MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Millar Wind Farm in South Australia, followed by the Mt Mercer Wind Farm in Victoria. In early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation. We have supplemented our asset portfolio by entering into a number of power purchase agreements with other renewable generators, and through this investment in new generation we have continued to support Australia's transition to renewable energy.

Powershop is an innovative retailer committed to providing lower prices for customers and which recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Over the last five years, Powershop has introduced a number of significant, innovative and customer-centric initiatives into the Victorian market, including the first mobile app that allows customers to monitor their usage, a peer-to-peer solar trading trial and a successful customer-led demand response program. Powershop has also been active in supporting community energy initiatives, including providing operational and market services for the community-owned Hepburn Wind Farm, supporting the Warburton hydro project, and funding a large range of community and social enterprise energy projects through our Your Community Energy program.

Questions

5.1 Service Order Changes

5.1.1 Metering Works

Question 1: Do you support the changes detailed in section 5.1.1? (Answer should be one of "Yes" / "No - provide reason" / "Other - provide reason")

Yes.

Question 2: Are there additional enumerated fields whose addition to the Metering Service Works SO the IEC should consider? Please detail them.

No.

Question 3: Do you support the changes detailed in section 5.1.2? (Answer should be one of “Yes” / “No” / “Other – provide reason”)

Yes.

5.1.3 Allocate NMI

Question 4: Do you support the changes detailed in section 5.1.3? (Answer should be one of “Yes” / “No – provide reason” / “Other – provide reason”)

Yes.

5.2 One Way Notification Changes

Question 5: Given that the MFIN, which is XML-based, can be used for the same purpose as the MXN and avoids the issue related to partial acceptance of the MXN, do participants support the continued usage of the CSV-based MXN?

Powershop does not see the need to continue using the MXN given the MFIN can be used for the same purpose of the MXN.

Question 6: If the MXN were to be retired, would your organisation prefer Option 1 or Option 2 as presented above?

Powershop would prefer Option 1.

Question 7: If the MXN were to be retired, what would be the appropriate timeframe in which to retire it?

A 12 month retirement period would allow sufficient time for the MXN to be retired in a way that will not have an adverse impact on industry nor customers.

5.3 Increase to transaction size limit for Meter Data

Question 8: Will a 10 MB maximum file size for MTRD transactions cause substantial problems for your organisation?

For incoming MTRD transaction, we expect that potentially we may have some issues with processing as we serialise the transactions (i.e. one transaction at a time), but this isn't an immediate threat to our system.

Question 9: Does limiting the number of transactions within the MTRD group mitigate the potential problems caused by an increased maximum file size?

We would expect that this would mitigate potential issues with our system.

5.4 B2B Principles / 5.5 B2B Factors / 5.6 Benefits / 5.7 Costs

Question 11: Does your organisation have any concerns about the cost or business risk associated with the above changes? If so, please specify which change in particular concerns your organisation and why.

These changes in isolation are practical and comparatively cost-effective. Nevertheless Powershop is generally concerned around the number of market/regulatory related development changes that have been placed on industry over the last few years, particularly the significant cost burdens they place on customers (e.g. increased AEMO fees and significant development costs being worn by industry) and its stifling of innovation as a result of minimal development availability to work on customer-focused changes.

Question 12: If your organisation raised concerns in the above question, what alternative less-costly solutions might meet the requirements for the changes outlined in section 5?

N/A.

6.1 Consultation timeframes

Question 13: If one or more of the changes proposed in this document were to be adopted, would your organisation prefer an implementation date of 2 December 2020 or November 2021?

Powershop is supportive of all the changes in this document and would prefer a go-live date of November 2021.

6.2 New Verify Standing Data Transaction

Question 14: Do you see value in the development of new Verify Standing Data Transactions?

If "No":

Notionally Powershop do see value in the development of new Verify Standing Data Transactions. However, we encourage AEMO to provide an extensive implementation and go-live timeframe because of the unprecedented and continuous development work and cost being imposed on industry and customers.

If you have any queries or would like to discuss any aspect of this submission, please feel free to contact me.

Yours sincerely,



Haiden Jones
Operations Manager
Powershop Australia Pty Ltd
Meridian Energy Australia Pty Ltd