

# RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

FINAL REPORT AND DETERMINATION

Published: **March 2021**





## EXECUTIVE SUMMARY

The publication of this Final Report and Determination (Final Report) concludes the Rules consultation process on proposed changes to enable the Wholesale Demand Response Mechanism (WDRM) in the National Electricity Market (NEM) under the National Electricity Rules (NER), including clarifying changes in respect of Five Minute Settlement (5MS) and Customer Switching (Customer Switching).

The following retail procedures and related documents are amended as published with this Final Report:

- Market Settlements and Transfer Solution (MSATS) Procedures: Meter Data Management (MDM) Procedures (MDM Procedures).
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations (CATS Procedure).
- MSATS Procedures: Procedure for the Management (Wholesale, Interconnector, Generator and Sample (WIGS)) (WIGS Procedure).
- Metrology Procedure: Part B (Metrology Procedure Part B).
- Retail Electricity Procedures - Glossary and Framework (Glossary and Framework).
- Business-to-Business (B2B) Guide (B2B Guide).
- B2B e-Hub Participant Accreditation and Revocation Process (B2B Participant Process).
- Understanding Load Profiles Published from MSATS (Load Profiles Document).

In summary, the key proposals involve amendments to:

- Glossary and Framework and Load Profiles Documents to reflect 5MS.
- Glossary and Framework to capture an additional document reference for Customer Switching.
- B2B Guide and B2B Participant Process to include the Demand Response Service Provider (DRSP) participant category.
- Retail procedures, to incorporate consequential changes.



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## 1. STAKEHOLDER CONSULTATION PROCESS

As required by NER 7.16.1 AEMO consulted on the proposed changes in accordance with the Rules consultation process in NER 8.9.

AEMO's timeline for this consultation has been as follows:

Deliverable	Indicative date
Issues Paper & Notice of first stage consultation published	12 October 2020
First stage submissions closed	17 November 2020
Draft Report & Notice of Second Stage Consultation published	15 December 2020
Second Stage submissions closed	2 February 2021
Final Report published	16 March 2021

The publication of this Final Report marks the conclusion of this consultation.

## 2. BACKGROUND

### 2.1. NER requirements

The obligations to establish, maintain and publish the procedures are set out in NER 7.16.1

### 2.2. Context for this consultation

The Australian Energy Market Commission (AEMC) published the final determination in respect of the WDRM rule change on 11 June 2020. The implementation date for the final rule is 24 October 2021.

The WDRM rule change:

- Introduces the new market participant category, the Demand Response Service Provider (DRSP).
- Places obligations on DRSPs which replicate those applied to scheduled participants, including in respect of information provision and scheduling.
- Sets out the process for the baseline methodologies being determined and applied to wholesale demand response units (WDRUs).
- Provides for DRSPs to be settled in the wholesale market for the wholesale demand response (WDR) which they have provided at the prevailing spot market price.
- Sets out consequential changes to other aspects of the NER, including to Reliability and Emergency Reserve Trader (RERT) provisions.
- Makes additional changes to related aspects of the NER, such as the demand side participation information provisions, to improve the integration of the demand side.

In addition, this consultation has resulted in clarifying changes in respect of 5MS and Customer Switching, effective on 1 October 2021.

### 2.3. First stage consultation

AEMO issued the Notice of First Stage Consultation on 12 October 2020.

The key proposals in the Issues Paper involved amending:

- Glossary and Framework and Load Profiles Documents, to reflect 5MS.
- Glossary and Framework to capture an additional document reference for Customer Switching.



- B2B Guide and B2B Participant Process, to include the Demand Response Service Provider (DRSP) participant category.
- Retail procedures, to incorporate consequential changes.

AEMO received 14 written submissions. AEMO also held a workshop with over 100 attendees on 6 November 2020.

Copies of all written submissions, minutes of meetings and issues raised in forums (excluding any confidential information) have been published on AEMO’s website at:

<https://aemo.com.au/consultations/current-and-closed-consultations/retail-procedures-wholesaledemand-response>.

## 2.4. Second stage consultation

On 15 December 2020, AEMO published the Draft Report and Determination (Draft Report), Draft Procedures and Notice of Second Stage Consultation.

AEMO received six written submissions.

## 3. SUMMARY OF MATERIAL ISSUES

There were no material issues raised by stakeholders in feedback.

In the Second Stage of Consultation, AEMO considered the following material issues arising from the proposal and raised by Consulted Persons:

No.	Issue	Raised by
1.	Use of Planned Interruption Notification to Advise DRSP	Multiple parties
2.	DRSP Role in Determining Substitutions under Metrology Procedure	Multiple parties
3.	DRSP Role in Proposing Amendments to B2B Procedures	Red Energy and Lumo Energy

A detailed summary of issues raised by Consulted Persons in submissions together with AEMO’s responses, is in **Appendix B**.

## 4. DISCUSSION OF MATERIAL ISSUES

### 4.1. Use of Planned Interruption Notification to Advise DRSP

#### 4.1.1. Issue summary and submissions

A DRSP will be required to bid the availability of its demand response into the NEM systems for scheduling purposes. Accordingly, the DRSP will need to know when a NMI will be unavailable as a result of a site outage, due to a planned local network outage, or electrical work at the site, for example.

In the Issues Paper, AEMO asked stakeholders whether relevant participants could use the B2B Planned Interruption Notification (PIN) to notify the DRSP of an upcoming outage. Respondents did not support the proposed changes.

Subsequently, the Information Exchange Committee (IEC):

- Agreed that the DRSP and customer relationship is the lowest cost method, in contrast to the higher-cost PIN approach.
- Noted also that a DRSP may choose to receive communications of outage notifications directly with the end user, irrespective of the availability of the PIN.



The changes that had originally been proposed in the Issues Paper were removed from the B2B Guide for the Second Stage of Consultation.

#### **4.1.2. IEC's assessment**

The IEC concluded that the proposed changes were not supported for inclusion.

#### **4.1.3. IEC's conclusion**

The B2B Guide has not been changed.

### **4.2. DRSP Role in Determining Substitutions under Metrology Procedure**

#### **4.2.1. Issue summary and submissions**

In response to the Issues Paper, Evoenergy, AGL, Red Energy and Lumo Energy, as well as Origin Energy, questioned the role of the DRSP in agreeing the use of substitute meter values in respect of clauses 2.2(j), 3.2(g), 3.3.6 and 3.3.8 of the Metrology Procedure Part B. The proposed changes had been included in the First Stage Consultation consequent to the WDRM rule change.

Accordingly, in the Second Stage Consultation AEMO concluded that MDPs would not be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B was amended accordingly. This approach was supported in stakeholder feedback.

#### **4.2.2. AEMO's assessment**

The conclusion that MDPs would not be required to seek agreement from the DRSP for relevant substitution types was clearly supported in participant feedback.

#### **4.2.3. AEMO's conclusion**

Accordingly, AEMO has not made changes to the Metrology Procedure Part B in this regard.

### **4.3. DRSP Role in Proposing Amendments to B2B Procedure and Guide**

#### **4.3.1. Issue summary and submissions**

During the Second Stage of Consultation, Red Energy and Lumo Energy did not support the proposed changes to the B2B Procedure and Guide to include the DRSP role more broadly. However, other respondents agreed that the DRSP role should be added to the B2B Guide.

The IEC and AEMO did not agree with Red Energy and Lumo Energy that the industry should wait for a registered DRSP to propose changes to the B2B Procedures. The need to wait for a DRSP to first register as a market participant, then propose changes to the B2B Procedures, would likely delay the inclusion of DRSPs into the B2B processes, until 2022 at the earliest. The proposed changes in the Draft Report were intended to allow new and existing participants to make decisions in respect of system and process changes, in preparation for the rule change becoming effective.

This approach was supported in participant feedback.

#### **4.3.2. AEMO's assessment**

AEMO received feedback supporting the proposed changes in the B2B Guide which are intended to clearly indicate which participants may use the B2B transactions relating to the WDRM. AEMO did not receive any further feedback which did not support the changes proposed during the Second Stage of Consultation.



### 4.3.3. AEMO's conclusion

The B2B Guide is amended as proposed, with the IEC's approval.

## 5. OTHER MATTERS

### 5.1.1. Aggregation threshold for WDRU

AusNet Services commented as follows in relation to the CATS Procedures section 2.9:

*"Further clarification should be included within this statement to avoid confusion as the use of the SMALL NMI Classification does not correctly describe the DRSP eligibility only extends to small (with 40 – 100 MWh threshold) business customers with a metering installation type of 1, 2, 3, or 4..."*

Ausnet Services referenced a number of provisions in the NER as well as the National Energy Retail Law.

AEMO:

- Considers that the NER 2.3.6(m)(2) refers only to NERR 5(2)(a) in respect of aggregations.
- Has endeavoured to reflect NER 2.3.6(m)(2) in the CATS Procedures section 2.9.
- Does not consider it necessary to clarify the CATS Procedures 2.9.
- Considers that referencing jurisdictional rules can introduce additional regulatory complexity.
- Considers that the use of other regulatory instruments is beyond the intent of NER 2.3.6(m)(2).

### 5.1.2. AEMO to populate MSATS with DRSP

Red Energy and Lumo Energy suggested the following wording for the CATS Procedures section 2.10(h):

*"2.10(h) Populate MSATS with the DRSP for the appropriate NMIs where the loads have been classified as wholesale demand response units within 2 business days of the load being classified, and with a prospective date of at least 2 days from the date of the update taking place in MSATS."*

*2.10(i) Populate MSATS with the Participant ID of NOWDRU for the appropriate NMIs where the loads have been ~~de~~unclassified as wholesale demand response units within 2 business days of the load being ~~de~~unclassified, and with a prospective date of at least 2 days from the date of the update taking place in MSATS."*

In practice, AEMO will raise the Change Request (CR) as soon as the registration and classification of the load has been approved by the AEMO Participant Registration Committee (PRC). If the approval is provided:

- Before the effective date of either the registration or classification of the load then AEMO will raise a prospective CR.
- but if the approval date is the same as the effective date or the effective date is prior to the approval date AEMO will raise a retrospective change request.

CR's will not be raised prior to approvals being received, in order to reduce any potential for errors or rework which may otherwise occur, in the event that the registration or classification were not ultimately to proceed.

### 5.1.3. Inclusion of DRSP role as an initiator for VerifyMeterDataRequest and recipient for VerifyMeterDataResponse.

Red Energy and Lumo Energy (along with multiple other participants) provided feedback in the First Stage of Consultation that the DRSP should not have a role in determining the values to apply for a meter substitute (refer section 4.2 above). In the Second Stage Consultation, Red Energy and Lumo Energy have commented:



*"AEMO's response to our objection to the inclusion of the DRSP role is not clear. When referring to AEMO's response in Table 1, item 475, as instructed, the comments read: The DRSP will only be settled when the metering data has a quality flag of "A" or "F". MDPs will now no longer be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B will be amended accordingly.*

*The above drafting is unclear as it can be read that the DRSP role would not be added. However, when reviewing the marked version of the B2B e-Hub accreditation draft v1.3, the DRSP role has been left as included. Red and Lumo recommend that AEMO strike out the wording 'or DRSP' from **Table 1 B2B Transactions** in both the columns of **Initiator/s** and **Recipient** for **Transaction Type** of **VerifyMeterDataRequest** and **VerifyMeterDataResponse**."*

In the Draft Report, AEMO identified that it will include WDR in the settlement process only where the metering data has the quality flag of "actual" or "final". Accordingly, the DRSP's would not need to be involved in the agreement for substitution process, given they will have no financial interest in the result. However, this should not preclude DRSP's from requesting verification of the metering data which they have received. On this basis, the DRSP role has been included as initiator and recipient of the Verify Meter Data transaction in the B2B Guide, table 1 B2B transactions. Other feedback supported this approach.

#### **5.1.4. Minor corrections**

Participants highlighted some typos that have been amended in the procedures and related documents, as highlighted in the feedback.

## **6. FINAL DETERMINATION**

Accordingly, AEMO's final determination is to amend the following retail procedures and related documents in the form published with this Final Report:

- Market Settlements and Transfer Solution (MSATS) Procedures: Meter Data Management (MDM) Procedures (MDM Procedures).
- MSATS Procedures: Consumer Administration and Transfer Solution (CATS) Procedure Principles and Obligations (CATS Procedure).
- MSATS Procedures: Procedure for the Management (Wholesale, Interconnector, Generator and Sample (WIGS)) (WIGS Procedure).
- Metrology Procedure: Part B (Metrology Procedure Part B).
- Retail Electricity Procedures - Glossary and Framework (Glossary and Framework).
- Business-to-Business (B2B) Guide (B2B Guide).
- B2B e-Hub Participant Accreditation and Revocation Process (B2B Participant Process).
- Understanding Load Profiles Published from MSATS (Load Profiles Document).

**APPENDIX A. GLOSSARY**

Term or acronym	Meaning
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
DRSP	Demand Response Service Provider
5MS	Five Minute Settlement
IEC	Information Exchange Committee
NEM	National Electricity market
NER	National Electricity Rules
RERT	Reliability and Emergency Reserve Trader
WDR	Wholesale Demand Response
WDRU	Wholesale Demand Response Unit

## APPENDIX B. SUMMARY OF SUBMISSIONS AND AEMO RESPONSES

## 1. MSATS PROCEDURES: CATS

No.	Section	Consulted Person	Respondent Comments	AEMO Response
1	2.9	Origin Energy	noted	
2		AGL	Agree with improved drafting.	AEMO notes the respondent's support for the change.
3		AusNet Services	<ul style="list-style-type: none"> <li>Further clarification should be included within this statement to avoid confusion as the use of the SMALL NMI Classification does not correctly describe the DRSP eligibility only extends to small (with 40 – 100 MWh threshold) business customers with a metering installation type of 1, 2, 3, or 4 as specified in the following rules;</li> <li>5(2)(a) of the National Energy Retail Rules</li> <li>2.3.6(m)(2)(i) of the National Electricity Rules</li> <li>Part 1, Division 1, Section 5 of the National Energy Retail Law (South Australia) Act 2011 – 20.0.2018</li> <li>Part 2, Section 7 and 8 of the National Energy Retail Regulations under the National Energy Retail Law and section 12 of the National Energy Retail Law (South Australia) Act 2011</li> </ul>	The WDR Rule only refers to NERR 5(2)(a) for the aggregations not the other references stated. AEMO has reflected the rule change and does not consider it necessary to provide any further clarity. AEMO considers that jurisdictional rules can create additional regulatory complexity and that the use of other regulatory instruments may result in the implementation of a process that is beyond what was intended in the rule change.
4	2.10(h)	Origin Energy	noted	
5		AGL	Agree – 2 B/days provides some headroom for other processes	AEMO notes the respondent's support for the change.
6		AusNet Services	AusNet Services supports the amended AEMO obligation in regard to the DRSP being populated in	AEMO notes the respondent's support for the change

No.	Section	Consulted Person	Respondent Comments	AEMO Response
			MSATS within 2 business days of the load being classified.	
7	6.1.8	Origin Energy	noted	
8		AGL	Agree	AEMO notes the respondent's support for the change.
9		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change
10	6.2.8	Origin Energy	noted	
11		AGL	Agree	AEMO notes the respondent's support for the change.
12		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
13	10.1.7	Origin Energy	noted	
14		AGL	Agree	AEMO notes the respondent's support for the change.
15		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change
16	10.2.7	Origin Energy	noted	
17		AGL	Agree	AEMO notes the respondent's support for the change.
18		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
19	10.3.7	Origin Energy	noted	
20		AGL	Agree	AEMO notes the respondent's support for the change.
21		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
22	10.4.8	Origin Energy	noted	

No.	Section	Consulted Person	Respondent Comments	AEMO Response
23		AGL	Agree	AEMO notes the respondent's support for the change.
24		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
25	10.5.8	Origin Energy	noted	
26		AGL	Agree	AEMO notes the respondent's support for the change.
27		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
28	10.6.7	Origin Energy	noted	
29		AGL	Agree	AEMO notes the respondent's support for the change.
30		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
31	11.1.7	Origin Energy	noted	
32		AGL	Agree	AEMO notes the respondent's support for the change.
33		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
34	11.2.7	Origin Energy	noted	
35		AGL	Agree	AEMO notes the respondent's support for the change.
36		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
37	11.3.7	Origin Energy	noted	
38		AGL	Agree	AEMO notes the respondent's support for the change.
39		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.

No.	Section	Consulted Person	Respondent Comments	AEMO Response
40	12.3.7	Origin Energy	noted	
41		AGL	Agree	AEMO notes the respondent's support for the change.
42		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
43	12.4.7	Origin Energy	noted	
44		AGL	Agree	AEMO notes the respondent's support for the change.
45		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
46	12.5.7	Origin Energy	noted	
47		AGL	Agree	AEMO notes the respondent's support for the change.
48		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
49	12.6.7	Origin Energy	noted	
50		AGL	Agree	AEMO notes the respondent's support for the change.
51		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
52	13.1.7	Origin Energy	noted	
53		AGL	Agree	AEMO notes the respondent's support for the change.
54		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
55	13.2.8	Origin Energy	noted	
56		AGL	Agree	AEMO notes the respondent's support for the change.

No.	Section	Consulted Person	Respondent Comments	AEMO Response
57		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
58	13.3.7	Origin Energy	noted	
59		AGL	Agree	AEMO notes the respondent's support for the change.
60		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
61	13.4.7	Origin Energy	noted	
62		AGL	Agree	AEMO notes the respondent's support for the change.
63		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
64	13.5.7	Origin Energy	noted	
65		AGL	Agree	AEMO notes the respondent's support for the change.
66		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
67	13.6.7	Origin Energy	noted	
68		AGL	Agree	AEMO notes the respondent's support for the change.
69		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
70	13.7.8	Origin Energy	noted	
71		AGL	Agree	AEMO notes the respondent's support for the change.
72		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
73	13.8.9	Origin Energy	noted	

No.	Section	Consulted Person	Respondent Comments	AEMO Response
74		AGL	Agree	AEMO notes the respondent's support for the change.
75		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
76	14.1.5	Origin Energy	noted	
77		AGL	Agree	AEMO notes the respondent's support for the change.
78		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
79	14.2.5	Origin Energy	noted	
80		AGL	Agree	AEMO notes the respondent's support for the change.
81		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
82	15.1.4(d)	Origin Energy	noted	
83		AGL	Agree	
84		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
85	15.1.7	Origin Energy	noted	
86		AGL	Agree	AEMO notes the respondent's support for the change.
87		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
88	Table 16-C	Origin Energy	noted	
89		AGL	Agree	AEMO notes the respondent's support for the change.
90		AusNet Services	AusNet Services supports the inclusion of the DRSP role in the NMI Discovery Access Rules, but would prefer the	Agree, AEMO has made the recommended changes in the published procedures.

No.	Section	Consulted Person	Respondent Comments	AEMO Response
			list remains to be displayed alphabetically – moving the DRSP to the first row.	
91	Clause 16.3.3(b)	PLUS ES	<b>Typo:</b> <i>Table 16-C. Error! Reference source not found.</i>	Agree, AEMO has made the recommended changes in the published procedures.
92	AEMO to Populate MSATS with the DRSP for the appropriate NMI where the loads have been classified as wholesale demand response units.	Red Energy and Lumo Energy	<p>Red Energy and Lumo Energy (Red and Lumo) are pleased to see AEMO assign itself a timeframe of two business days for updating the NMI in MSATS where the load is classified or unclassified. The procedure needs to be further amended to ensure that the update is dated prospectively, allowing enough notice to be provided to both the DRSP and the retailer for necessary actions at their respective ends.</p> <p>Proposed wording for MSATS CATS Procedures:</p> <p>2.10(h) Populate MSATS with the DRSP for the appropriate NMIs where the loads have been classified as wholesale demand response units within 2 business days of the load being classified, and with a prospective date of at least 2 days from the date of the update taking place in MSATS.</p> <p>2.10(i) Populate MSATS with the Participant ID of NOWDRU for the appropriate NMIs where the loads have been <del>de</del>unclassified as wholesale demand response units within 2 business days of the load being <del>de</del>unclassified, and with a prospective date of at least 2 days from the date of the update taking place in MSATS.</p>	<p>AEMO will raise the CR as soon as the registration and classification of the load has been approved by our Participant Registration Committee (PRC). If the approval is provided before the effective date of either the registration or classification of the load then we will raise a prospective CR but if the approval date is the same as the effective date or the effective date is prior to the approval date we will raise a retrospective change request.</p> <p>Change requests will not be raised prior to approvals being received to reduce any errors/rework that may occur if the registration/load classification does not proceed.</p>
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## 2. MSATS PROCEDURES: WIGS

No.	Section	Consulted Person	Respondent Comments	AEMO Response
94	Version	Origin Energy	noted	
95		AGL	Agree	AEMO notes the respondent's support for the change.
96		AusNet Services	Agreed.	AEMO notes the respondent's support for the change.
97	2.1.8	Origin Energy	noted	
98		AGL	Agree	AEMO notes the respondent's support for the change.
99		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
100	2.2.8	Origin Energy	noted	
101		AGL	Agree	AEMO notes the respondent's support for the change.
102		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
103	5.2.7	Origin Energy	noted	
104		AGL	Agree	AEMO notes the respondent's support for the change.
105		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
106	5.3.7	Origin Energy	noted	
107		AGL	Agree	AEMO notes the respondent's support for the change.
108		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
109	5.4.7	Origin Energy	noted	
110		AGL	Agree	AEMO notes the respondent's support for the change.

111		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
112	5.5.7	Origin Energy	noted	
113		AGL	Agree	AEMO notes the respondent's support for the change.
114		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
115	6.1.7	Origin Energy	noted	
116		AGL	Agree	AEMO notes the respondent's support for the change.
117		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
118	6.2.7	Origin Energy	noted	
119		AGL	Agree	AEMO notes the respondent's support for the change.
120		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
121	6.3.7	Origin Energy	noted	
122		AGL	Agree	AEMO notes the respondent's support for the change.
123		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
124	7.2.6	Origin Energy	noted	
125		AGL	Agree	AEMO notes the respondent's support for the change.
126		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
127	7.3.7	Origin Energy	noted	
128		AGL	Agree	AEMO notes the respondent's support for the change.

129		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
130	7.4.7	Origin Energy	noted	
131		AGL	Agree	AEMO notes the respondent's support for the change.
132		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
133	8.1.7	Origin Energy	noted	
134		AGL	Agree	AEMO notes the respondent's support for the change.
135		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
136	8.2.9	Origin Energy	noted	
137		AGL	Agree	AEMO notes the respondent's support for the change.
138		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
139	8.3.7	Origin Energy	noted	
140		AGL	Agree	AEMO notes the respondent's support for the change.
141		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
142	8.4.7	Origin Energy	noted	
143		AGL	Agree	AEMO notes the respondent's support for the change.
144		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
145	8.5.7	Origin Energy	noted	
146		AGL	Agree	AEMO notes the respondent's support for the change.

147		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
148	8.6.7	Origin Energy	noted	
149		AGL	Agree	AEMO notes the respondent's support for the change.
150		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
151	8.7.8	Origin Energy	noted	
152		AGL	Agree	AEMO notes the respondent's support for the change.
153		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
154	9.1.4	Origin Energy	noted	
155		AGL	Agree	AEMO notes the respondent's support for the change.
156		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
157	9.1.7	Origin Energy	noted	
158		AGL	Agree	AEMO notes the respondent's support for the change.
159		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
160	10.1.5	Origin Energy	noted	
161		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
162		AGL	Agree	AEMO notes the respondent's support for the change.
163	10.2.5	Origin Energy	noted	
164		AGL	Agree	AEMO notes the respondent's support for the change.

165		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
166	Inclusion of DRSP role as a participant the MDPs need to seek agreement from for using substitution types.	Red Energy and Lumo Energy	Red and Lumo support AEMO's decision that MDPs should not be required to seek agreement from the DRSP for relevant substitution types	AEMO notes the respondent's support for the change.

**3. METROLOGY PROCEDURE: PART B**

No.	Section	Consulted Person	Respondent Comments	AEMO Response
167	2.2(j)	Origin Energy	Origin acknowledges and supports the removal of the DRSP as a participant to agree to substitution accuracy.	AEMO notes the respondent's support for the change.
168		AGL	Agree with removal of DRSP role from this process.	AEMO notes the respondent's support for the change.
169		AusNet Services	AusNet Services supports the removal of the DRSP role from being required to provide approval to the MDP on substitution types.	AEMO notes the respondent's support for the change.
170		PLUS ES	PLUS ES supports the exclusion of the DRSP.	AEMO notes the respondent's support for the change.
171	2.2(n)	Origin Energy	Noted	
172		AGL	Agree	AEMO notes the respondent's support for the change.
173		AusNet Services	AusNet Services supports the insertion of the words "as required or" in the prescribed sentence.  In response to End User transfers as required or following a Retailer of Last Resort (RoLR) Event	AEMO notes the respondent's support for the change.
174	3.2(g)	Origin Energy	Origin acknowledges and supports the removal of the DRSP as a participant to be part of the substitution agreement	AEMO notes the respondent's support for the change.
175		AGL	Agree with removal of DRSP role from this process.	AEMO notes the respondent's support for the change.
176		AusNet Services	AusNet Services supports the removal of the DRSP role from being required to provide approval to the MDP on substitution types.	AEMO notes the respondent's support for the change.

177		PLUS ES	PLUS ES supports the exclusion of the DRSP.	AEMO notes the respondent's support for the change.
178	3.2(h)	Origin Energy	Origin acknowledges and supports the removal of the DRSP.	AEMO notes the respondent's support for the change.
179		AGL	Agree with removal of DRSP role from this process.	AEMO notes the respondent's support for the change.
180		AusNet Services	AusNet Services supports the removal of the DRSP role from being required to provide approval to the MDP on substitution types	AEMO notes the respondent's support for the change.
181		PLUS ES	PLUS ES supports the exclusion of the DRSP.	AEMO notes the respondent's support for the change.
182	3.3.6	Origin Energy	Origin acknowledges and supports the removal of the DRSP as a participant to be part of the substitution agreement	AEMO notes the respondent's support for the change.
183		AGL	Agree with removal of DRSP role from this process.	AEMO notes the respondent's support for the change.
184		AusNet Services	AusNet Services supports the removal of the DRSP role from being required to provide approval to the MDP on substitution types.	AEMO notes the respondent's support for the change.
185		PLUS ES	PLUS ES supports the exclusion of the DRSP.	AEMO notes the respondent's support for the change.
186	3.3.8	Origin Energy	Origin acknowledges and supports the removal of the DRSP as a participant to be part of the substitution agreement	AEMO notes the respondent's support for the change.
187		AGL	Agree with removal of DRSP role from this process.	AEMO notes the respondent's support for the change
188		AusNet Services	AusNet Services supports the removal of the DRSP role from being required to provide approval to the MDP on substitution types.	AEMO notes the respondent's support for the change.

189		PLUS ES	PLUS ES support the exclusion of the DRSP.	AEMO notes the respondent's support for the change.
190	14.1	Origin Energy	Noted	
191		AGL	Agree with change.	AEMO notes the respondent's support for the change.
192		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
193	14.2.1	Origin Energy	Noted	
194		AGL	Agree with change.	AEMO notes the respondent's support for the change.
195		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
196	14.2.2	Origin Energy	Noted	
197		AGL	Agree with change.	AEMO notes the respondent's support for the change.
198		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
199	14.2.2(b)	Origin Energy	Noted	
200		AGL	Agree	AEMO notes the respondent's support for the change.
201		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
202	14.3(g)	Origin Energy	Noted	
203		AGL	Agree	AEMO notes the respondent's support for the change.
204		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.

<p>205</p>	<p>Inclusion of DRSP role as an initiator for VerifyMeterDataRequest and recipient for VerifyMeterDataResponse.</p>	<p>Red Energy and Lumo Energy</p>	<p>AEMO’s response to our objection to the inclusion of the DRSP role is not clear. When referring to AEMO’s response in Table 1, item 475, as instructed, the comments read: <i>The DRSP will only be settled when the metering data has a quality flag of "A" or "F". MDPs will now no longer be required to seek agreement from the DRSP for relevant substitution types. The Metrology Procedure Part B will be amended accordingly.</i></p> <p>The above drafting is unclear as it can be read that the DRSP role would not be added. However, when reviewing the marked version of the B2B e-Hub accreditation draft v1.3, the DRSP role has been left as included. Red and Lumo recommend that AEMO strike out the wording ‘or DRSP’ from <b>Table 1 B2B Transactions</b> in both the columns of <b>Initiator/s</b> and <b>Recipient</b> for <b>Transaction Type</b> of <b>VerifyMeterDataRequest</b> and <b>VerifyMeterDataResponse</b>.</p>	<p>The DRSP’s are not involved in the agreement for substitution process as they will have no financial interest in the process as we will only be settling on actual or final metering data, however this should not preclude them from verifying the metering data that they have received.</p>
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**4. GLOSSARY AND FRAMEWORK**

No.	Section	Consulted Person	Respondent Comments	AEMO Response
206	Glossary	Origin Energy	Noted	
207		AGL	Agree	AEMO notes the respondent's support for the change.
208		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.

## 5. B2B GUIDE

No.	Section	Consulted Person	Respondent Comments	IEC Response
209	5.1 Inclusion of the DRSP role in the B2B transactions and Participants table.	Origin Energy	Noted	
210		AGL	Agree	IEC notes the respondent's support for the change.
211		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.
212	Table 1 Inclusion of DRSP role as an initiator for PMD Meter Data Process.	Origin Energy	Noted	
213		AGL	Agree	IEC notes the respondent's support for the change.
214		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.
215	Table 1 Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Origin Energy	Noted	
216		AGL	Agree	IEC notes the respondent's support for the change.
217		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.
218	Table 1 Inclusion of DRSP role as a recipient of Meter Data Notification.	Origin Energy	Noted	
219		AGL	Agree	IEC notes the respondent's support for the change.
220		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.
221	6.6.1(a)	Origin Energy	Noted	

222		AGL	Agree	IEC notes the respondent's support for the change.
223		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.
224	6.6.2(a)	Origin Energy	Noted	
225		AGL	Agree	IEC notes the respondent's support for the change.
226		AusNet Services	AusNet Services supports this amendment.	IEC notes the respondent's support for the change.

6. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

No.	Section	Consulted Person	Respondent Comments	AEMO Response
227	2.2.1	Origin Energy	Noted	
228		AGL	Noted that DRSP has been removed.	
229		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
230	2.5	AGL	AGL largely agree with changes, however, the drafting is unclear if both the Appendix A and Appendix C forms are required as there is no <b>and/or</b> at the end of 2.5(a).	AEMO has amended the clause to remove uncertainty of how it is applied. AEMO also refer AGL to section 2.2 which had information about the application and what it required of participants.
231	Appendix B, table 1 Inclusion of DRSP role as an initiator for ProvideMeterDataRequest.	Origin Energy	Noted	

232		AGL	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transactions are specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>	<p>As this is only the accreditation process and this process is designed to ensure participants can connect to AEMO's systems and raise technically valid transactions AEMO believe that only the transactions that would regularly be used need to be tested.</p> <p>This does not preclude the DRSP arranging with other participants to agree to use other transactions.</p>
233		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
234	Appendix B, table 1 Inclusion of DRSP role as a recipient of ProvideMeterDataResponse.	Origin Energy	Noted	

235		AGL	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transaction size specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>	AEMO refers the response in item 232
236		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
237	Appendix B, table 1 Inclusion of DRSP role as an initiator for VerifyMeterDataRequest.	Origin Energy	Noted	
238		AGL	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transaction size specified for them</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>	AEMO refers the response in item 232
239		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.

240	Inclusion of DRSP role as a recipient of VerifyMeterDataResponse.	Origin Energy	Noted	
241		AGL	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3<sup>rd</sup> party B2B participants (which would include a DRSP) and no minimum transactions are specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>	AEMO refers the response in item 232
242		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.
243	Appendix B, table 1 Inclusion of DRSP role as a recipient of MeterDataNotification.	Origin Energy	Noted	

244		AGL	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3<sup>rd</sup> party B2B participants (which would include a DRSP) and no minimum transaction size specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>	AEMO refers the response in item 232
245		AusNet Services	AusNet Services supports this amendment.	AEMO notes the respondent's support for the change.



## 7. GENERAL

No.	General	Consulted Person	Participant Comments		AEMO Response
246	Do you have any other comments to make on the Draft Determination?	Origin Energy	Origin supports the IEC assessment on the use of the Planned Interruption Notification to advise DRSPs. We acknowledge the DRSP and customer relationship is the lowest cost method and seen as the practical approach in the initial establishment of WDRM. As the WDRM matures industry can be in a position to review the most efficient communication approach for planned outages.		IEC notes the respondent's support for the decision.
247		Energex and Ergon Energy Network	<p>Energex and Ergon Energy Network are seeking further clarification on the following issues:</p> <ol style="list-style-type: none"> <li>1. Eligibility of POC Exempt NMs to register with a DRSP; and</li> <li>2. What is expected from the 24 June 2021 milestone, i.e. whether AEMO will publish the DRSP from this date or from the 24 October 2021 effective date? If it is the former, further clarification is required as to the process to be followed if the LNSP is not system ready to receive DRSP communications from June 2021 and whether reporting will be available so that reconciliation processes can occur between June and October 2021.</li> </ol>		<p>1. AEMO notes that the isolated networks in regional Queensland (for example Mt Isa) are not physically connected to the NEM and are not settled as part of the NEM</p> <p>2.Registrations can be applied for from the 24 June but they will not be allocated to the NMs in MSATS until the system goes live and with the effective date of 24 October 2021 not 24 June 2021</p>
248		PLUS ES	Plus ES	MDPs would also require to understand when a DR event has occurred to assist them with analysis and enquiries with respect to metering data i.e. Information such as the duration of the event and the impact to the normal load.	<p>AEMO notes the respondent's comment. AEMO is not aware of a scenario where the MDP needs to know this information. AEMO requests the respondent to provide examples or more information</p> <p>The wholesale settlement process is based solely on the metering data delivered by the MDP. The MDP's obligations are to deliver the metering data they collect from the meter. The metering data you would validate will be the actual</p>



					<p>as to why this would be an important requirement.</p>	<p>data from the meter not the calculation on how the DRSP is paid.</p> <p>As a customer who has agreed to take part of the DRSP program they have the knowledge within their business to know when they are taking part in an event.</p> <p>The Retailer will also be aware that an event has happened and should expect the metering data consumption drop.</p>
			<p>This value of this information is proportional to the number of events a site might undertake and the number of queries the MDP may receive to investigate. Having access to this information:</p> <ul style="list-style-type: none"> <li>• Would assist in the meter data validation process - Knowledge of a demand response event on a customer could help explain an uncharacteristic drop in consumption;</li> <li>• Would assist with meter data verification processes – Often data enquiries come from billing departments who might not familiar with the demand response event. Knowing that a demand response event has occurred, and its duration, would assist in providing verification feedback to a market participant.</li> </ul>			