

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Ausgrid

Submission Date: 17/11/2020.

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the initial draft procedures associated with the retail Procedures (Wholesale Demand Response) consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

1. Issues Related to Consultation Subject Matter

Question	Participant Comments
<p>Do you agree with the proposed changes to provide additional clarification to support 5MS? If not, please provide an explanation of why you do not support the proposed changes.</p>	
<p>Do you agree that the DRSP will need to know of planned outages?</p>	<p>Ausgrid acknowledges that a DRSP will need to be aware of a multitude of varying factors that will need to be considered with regard to a customer's ability to respond to a wholesale demand response event. These would include but not limited to:</p> <ul style="list-style-type: none"> • A planned outage initiated by the customer; • A planned outage initiated by the DNSP; • A metering planned outage initiated by the FRMP; • Unplanned outages.

Question	Participant Comments
<p>Do you agree that a PIN is the best mechanism for advising the DRSP? Does it need to be modified? Is there a better alternative?</p>	<p>Ausgrid does currently send a PIN for planned outages. We notify the impacted customers directly and publish outage notifications on Ausgrid’s website. It is not current industry practice for the DNSP to send a PIN for planned outages as per the current AEMO B2B Guide.</p> <p>There are limitations of what notification Ausgrid can provide to DRSP, such as:</p> <ul style="list-style-type: none"> • A planned outage initiated by the customer within their electrical installation (Ausgrid has no visibility of this); • Unplanned outages; • Restoration of customer load after a planned outage initiated by the DNSP or FRMP. <p>If Ausgrid were obligated to send a PIN to DRSPs, this would impose a significant cost (in dollars and resources) and it would be difficult to complete by October 2021. Other industry changes such as 5MS, GS and customer switching are already having a significant impact on Ausgrid resources.</p> <p>Ausgrid believes that customers participating in WDR would be well informed of the challenges and limitations on managing their load and generation resources. Ausgrid believes that the most appropriate solution is that the customer and the DRSP should have adequate arrangements and agreements in place to effectively manage load and notification of any interruptions that they, the network or the retailer are planning.</p>
<p>Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?</p>	<p>Ausgrid does not agree the PIN is the best solution for the reasons outlined above.</p>
<p>Do you agree with the proposed amendments to</p>	

Question	Participant Comments
the retail procedures which are included in this consultation package as change marked versions?	
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	
Do you agree with the proposed changes to the B2B Guide? If not, please provide an explanation of why you do not support the proposed changes.	
Do you agree with the proposed changes to the B2B Participant Process? If not, please provide an explanation of why you do not support the proposed changes.	
Are there any other changes to the B2B Guide that need to be made to support WDR?	
Are there any other WDR related issues which AEMO should consider in respect of the retail	

Question	Participant Comments
procedures including the B2B Procedures?	

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	
2.10(h)	AEMO to Populate MSATS with the DRSP for the appropriate NMIs where the loads have been classified as wholesale demand response units.	
6.1.8	Inclusion of DRSP role in notification of change.	
6.2.8	Inclusion of DRSP role in notification of change.	
10.1.7	Inclusion of DRSP role in notification of change.	
10.2.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
10.3.7	Inclusion of DRSP role in notification of change.	
10.4.8	Inclusion of DRSP role in notification of change.	
10.5.8	Inclusion of DRSP role in notification of change.	
10.6.7	Inclusion of DRSP role in notification of change.	
11.1.7	Inclusion of DRSP role in notification of change.	
11.2.7	Inclusion of DRSP role in notification of change.	
11.3.7	Inclusion of DRSP role in notification of change.	
12.3.7	Inclusion of DRSP role in notification of change.	
12.4.7	Inclusion of DRSP role in notification of change.	
12.5.7	Inclusion of DRSP role in notification of change.	
12.6.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
13.1.7	Inclusion of DRSP role in notification of change.	
13.2.8	Inclusion of DRSP role in notification of change.	
13.3.7	Inclusion of DRSP role in notification of change.	
13.4.7	Inclusion of DRSP role in notification of change.	
13.5.7	Inclusion of DRSP role in notification of change.	
13.6.7	Inclusion of DRSP role in notification of change.	
13.7.8	Inclusion of DRSP role in notification of change.	
13.8.9	Inclusion of DRSP role in notification of change.	
14.1.5	Inclusion of DRSP role in notification of change.	
14.2.5	Inclusion of DRSP role in notification of change.	
15.1.4(d)	AEMO to populate fields.	

Section	Description	Participant Comments
15.1.7	Inclusion of DRSP role in notification of change.	
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures.	
2.1.8	Inclusion of DRSP role in notification of change.	
2.2.8	Inclusion of DRSP role in notification of change.	
5.2.7	Inclusion of DRSP role in notification of change.	
5.3.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
5.4.7	Inclusion of DRSP role in notification of change	
5.5.7	Inclusion of DRSP role in notification of change.	
6.1.7	Inclusion of DRSP role in notification of change.	
6.2.7	Inclusion of DRSP role in notification of change.	
6.3.7	Inclusion of DRSP role in notification of change.	
7.2.6	Inclusion of DRSP role in notification of change.	
7.3.7	Inclusion of DRSP role in notification of change.	
7.4.7	Inclusion of DRSP role in notification of change.	
8.1.7	Inclusion of DRSP role in notification of change.	
8.2.9	Inclusion of DRSP role in notification of change.	
8.3.7	Inclusion of DRSP role in notification of change.	

Section	Description	Participant Comments
8.4.7	Inclusion of DRSP role in notification of change.	
8.5.7	Inclusion of DRSP role in notification of change.	
8.6.7	Inclusion of DRSP role in notification of change.	
8.7.8	Inclusion of DRSP role in notification of change.	
9.1.4	AEMO to populate fields.	
9.1.7	Inclusion of DRSP role in notification of change.	
10.1.5	Inclusion of DRSP role in notification of change.	
10.2.5	Inclusion of DRSP role in notification of change.	

4. Metrology Procedure: Part B

Section	Description	Participant Comments
12.5	Update to replace 'verification' with 'Validation'. Amend the section heading and introduction paragraph to better align with terminology used in SLP MP clause 4.2(b).	

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	
2.2(n)	Insertion of the words "as required or".	
3.2(g)	Inclusion of DRSP role.	
3.2(h)	Inclusion of DRSP role.	
3.3.6	Inclusion of DRSP role.	
3.3.8	Inclusion of DRSP role.	
14.1	Deletion of 'Jurisdiction' and replaced with "retailer".	

Section	Description	Participant Comments
14.2.1	Inclusion of the words “or End User transfer,”.	
14.2.2	Inclusion of the words “or End User transfer,”.	
14.2.2(b)	New clause “Utilise a reason code of ‘67’ for End User transfers,”.	
14.3(g)	Addition of the reason code 67.	

6. Glossary and Framework

Section	Description	Participant Comments
Glossary	Addition of the description of DRSP.	Agree

7. B2B Guide

Section	Description	Participant Comments
5.1	Inclusion of the DRSP role in the B2B transactions and Participants table.	
Table 1	Inclusion of DRSP role as an initiator for PMD Meter Data Process.	
Table 1	Inclusion of DRSP role as an initiator for VMD Meter Data Process.	
Table 1	Inclusion of DRSP role as a recipient of Meter Data Notification.	
6.6.1(a)	Inclusion of the DRSP role.	
6.6.2(a)	Inclusion of the DRSP role.	

8. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u> .	
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u> .	
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	