



Part of Energy Queensland

17 November 2020

Ms Audrey Zibelman
Chief Executive Officer and Managing Director
Australian Energy Market Operator Limited
PO Box A2449
SYDNEY SOUTH NSW 1235

NEM.Retailprocedureconsultations@aemo.com.au

Dear Ms Zibelman

Retail Procedures (Wholesale Demand Response)

Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network) welcome the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to the *Retail Procedures (Wholesale Demand Response) Issues Paper* (issues paper). AEMO has requested feedback on proposed changes outlined in the issues paper to various retail procedures that result from the Wholesale Demand Response rule changes which will take effect from 24 October 2021.

Feedback from Energex and Ergon Energy Network on the matters raised in the issues paper is provided in the attached response template.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on 0467 782 350 or Charmain Martin on 0438 021 254.

Yours sincerely

A handwritten signature in cursive script that reads 'Trudy Fraser'.

Trudy Fraser
Manager Regulation

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RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Energex and Ergon Energy Network

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
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.	Energex and Ergon Energy Network agree with the proposal.
Do you agree that the DRSP will need to know of planned outages?	Energex and Ergon Energy Network agree.
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>Energex and Ergon Energy Network do not agree that the PIN would be the best mechanism for advising the DRSP.</p> <p>Energex and Ergon Energy Network propose adopting the self-serve process currently used by retailers to access planned outage information.</p>

Question	Participant Comments
Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?	Energex and Ergon Energy Network do not agree, as per above comments.
Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?	Energex and Ergon Energy Network agree.
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	Energex and Ergon Energy Network agree.
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.	Energex and Ergon Energy Network agree.
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.	Energex and Ergon Energy Network agree.

Question	Participant Comments
Are there any other changes to the B2B Guide that need to be made to support WDR?	Energex and Ergon Energy Network are requesting further clarity regarding OWNs required by the DRSP (see detailed feedback below).
Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	Energex and Ergon Energy Network are seeking clarification of the B2B functionality that will go-live to support participant registration from 24 June 2021.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	Energex and Ergon Energy Network request further clarification on the NMIs that are eligible to register with a DRSP. Specifically, further detail should be provided around eligible Metering Installation Type codes that can have a DRSP applied e.g. LARGE NMI Class with BASIC metering.
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.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
6.1.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
6.2.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.2.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.4.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.5.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.6.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
11.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
11.2.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
11.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
12.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
12.4.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
12.5.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
12.6.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.2.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.4.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.5.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.6.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
13.7.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
13.8.9	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
14.1.5	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
14.2.5	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
15.1.4(d)	AEMO to populate fields.	Energex and Ergon Energy Network have no comments.
15.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	Energex and Ergon Energy Network have no comments.

3. MSATS Procedures: WIGS

Section	Description	Participant Comments
Version	Updated to align version numbering with MSATS: CATS procedures.	Energex and Ergon Energy Network have no comments.
2.1.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
2.2.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
5.2.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
5.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
5.4.7	Inclusion of DRSP role in notification of change	Energex and Ergon Energy Network have no comments.
5.5.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
6.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
6.2.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
6.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
7.2.6	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
7.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
7.4.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
8.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.2.9	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.3.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.4.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.5.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.6.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
8.7.8	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
9.1.4	AEMO to populate fields.	Energex and Ergon Energy Network have no comments.
9.1.7	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.1.5	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.
10.2.5	Inclusion of DRSP role in notification of change.	Energex and Ergon Energy Network have no comments.

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).	Energex and Ergon Energy Network have no comments.

5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	Energex and Ergon Energy Network have no comments.
2.2(n)	Insertion of the words "as required or".	Energex and Ergon Energy Network have no comments.
3.2(g)	Inclusion of DRSP role.	Energex and Ergon Energy Network have no comments.
3.2(h)	Inclusion of DRSP role.	Energex and Ergon Energy Network have no comments.

Section	Description	Participant Comments
3.3.6	Inclusion of DRSP role.	Energex and Ergon Energy Network have no comments.
3.3.8	Inclusion of DRSP role.	Energex and Ergon Energy Network have no comments.
14.1	Deletion of 'Jurisdiction' and replaced with 'retailer'.	Energex and Ergon Energy Network have no comments.
14.2.1	Inclusion of the words "or End User transfer,".	Energex and Ergon Energy Network have no comments.
14.2.2	Inclusion of the words "or End User transfer,".	Energex and Ergon Energy Network have no comments.
14.2.2(b)	New clause "Utilise a reason code of '67' for End User transfers,".	Energex and Ergon Energy Network have no comments.
14.3(g)	Addition of the reason code 67.	Energex and Ergon Energy Network have no comments.

6. Glossary and Framework

Section	Description	Participant Comments
Glossary	Addition of the description of DRSP.	Energex and Ergon Energy Network have no comments.

7. B2B Guide

Section	Description	Participant Comments
5.1	Inclusion of the DRSP role in the B2B transactions and Participants table.	Energex and Ergon Energy Network note that the DRSP has not been listed in section 5 (Table of B2B communications) as a recipient or notified party of One Way Notifications, specifically NOMW, MFIN, PIN.
Table 1	Inclusion of DRSP role as an initiator for PMD Meter Data Process.	Energex and Ergon Energy Network have no comments.
Table 1	Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Energex and Ergon Energy Network have no comments.
Table 1	Inclusion of DRSP role as a recipient of Meter Data Notification.	Energex and Ergon Energy Network have no comments.
6.6.1(a)	Inclusion of the DRSP role.	Energex and Ergon Energy Network have no comments.

6.6.2(a)	Inclusion of the DRSP role.	Energex and Ergon Energy Network have no comments.
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8. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	Energex and Ergon Energy Network have no comments.
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u> .	Energex and Ergon Energy Network have no comments.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u> .	Energex and Ergon Energy Network have no comments.
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Energex and Ergon Energy Network have no comments.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Energex and Ergon Energy Network have no comments.
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Energex and Ergon Energy Network have no comments.