

# RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

## PROCEDURE CONSULTATION

## FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

***Participant:*** Origin Energy

***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.	The proposed changes to incorporate additional clarification to support 5MS changes into the MDM procedures are acceptable.  Please note minor adjustment required to 9.16. Title states MDM RM46, whilst the paragraph content refers to RM43.
Do you agree that the DRSP will need to know of planned outages?	There is benefit for the DRSP to be made aware of planned outages. As DRSPs will rely on various input data to manage their Demand Response scheduling; the provision of planned outage information would be a component of data required.

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>The PIN is an effective method to communicate a planned outage to the DRSP.</p> <p>In a practical sense, it would require all DRSPs to be B2B enabled for efficient application of the PIN. It would be cost prohibitive and ineffective for the initiators of the PIN if not all DRSPs were able to receive the PIN by B2B and required alternative method to suit their own communication protocols.</p>
<p>Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?</p>	<p>B2B is the most efficient method to communicate market transactions between participants. The PIN is a transaction used extensively today by Retailers. It would be prudent for both Retailers and LNSP to be consistent in the use of the One Way Notification – Planned Interruption notice as per the B2B guide. Origin are against allowing different communication methods and options for DRSPs to request their own method of communication as this introduces inefficiencies and cost for what may be small volumes of transactions.</p>
<p>Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?</p>	<p>Yes, please refer relevant feedback as applicable</p>

Question	Participant Comments
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	Yes, please refer feedback as per each procedure section
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.	Yes, please refer relevant feedback as applicable
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.	Yes
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 procedures including the B2B Procedures?	Origin questions how AEMO will consider life support as part of the WDRM registration process given Life Support is not part of Standing Data?

## 2. MSATS Procedures: CATS

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

Section	Description	Participant Comments
10.6.7	Inclusion of DRSP role in notification of change.	Noted
11.1.7	Inclusion of DRSP role in notification of change.	Noted
11.2.7	Inclusion of DRSP role in notification of change.	Noted
11.3.7	Inclusion of DRSP role in notification of change.	Noted
12.3.7	Inclusion of DRSP role in notification of change.	Noted
12.4.7	Inclusion of DRSP role in notification of change.	Noted
12.5.7	Inclusion of DRSP role in notification of change.	Noted
12.6.7	Inclusion of DRSP role in notification of change.	Noted
13.1.7	Inclusion of DRSP role in notification of change.	Noted
13.2.8	Inclusion of DRSP role in notification of change.	Noted
13.3.7	Inclusion of DRSP role in notification of change.	Noted

Section	Description	Participant Comments
13.4.7	Inclusion of DRSP role in notification of change.	Noted
13.5.7	Inclusion of DRSP role in notification of change.	Noted
13.6.7	Inclusion of DRSP role in notification of change.	Noted
13.7.8	Inclusion of DRSP role in notification of change.	Noted
13.8.9	Inclusion of DRSP role in notification of change.	Noted
14.1.5	Inclusion of DRSP role in notification of change.	Noted
14.2.5	Inclusion of DRSP role in notification of change.	Noted
15.1.4(d)	AEMO to populate fields.	Noted
15.1.7	Inclusion of DRSP role in notification of change.	Noted
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	DRSP do not get read type code returned in NMI discovery. As this field is being populated as part of MSATS review and meters provisioning 5 minute data, this information may be of value to the DRSP.

### 3. MSATS Procedures: WIGS

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

Section	Description	Participant Comments
6.3.7	Inclusion of DRSP role in notification of change.	Noted
7.2.6	Inclusion of DRSP role in notification of change.	Noted
7.3.7	Inclusion of DRSP role in notification of change.	Noted
7.4.7	Inclusion of DRSP role in notification of change.	Noted
8.1.7	Inclusion of DRSP role in notification of change.	Noted
8.2.9	Inclusion of DRSP role in notification of change.	Noted
8.3.7	Inclusion of DRSP role in notification of change.	Noted
8.4.7	Inclusion of DRSP role in notification of change.	Noted
8.5.7	Inclusion of DRSP role in notification of change.	Noted
8.6.7	Inclusion of DRSP role in notification of change.	Noted
8.7.8	Inclusion of DRSP role in notification of change.	Noted

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

#### 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).	Noted. Acknowledge this update is for Part A metrology procedures.

## 5. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	Origin considers it is unnecessary and can lead to longer lead time for resubstitutions to have a DRSP involved with agreements for interval periods they have no settlement interest in. Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the resubstituting of metering data, only, where the DRSP has financial interest for interval periods applicable to demand response.
2.2(n)	Insertion of the words “as required or”.	Noted
3.2(g)	Inclusion of DRSP role.	Origin considers it is unnecessary and can lead to longer lead time for substitution agreements to have a DRSP involved in Type 16 /18 methods for interval periods they have no settlement interest in. Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for type 16/18 substitutions only, where the DRSP has financial interest for interval periods applicable to demand response.
3.2(h)	Inclusion of DRSP role.	Noted
3.3.6	Inclusion of DRSP role.	Refer to comment in 3.2 (g).  Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the substituting of Type 16, only, where the DRSP has financial interest for interval periods applicable to demand response.

Section	Description	Participant Comments
3.3.8	Inclusion of DRSP role.	<p>Refer to comment in 3.2(g)</p> <p>Therefore, DRSP should be part of an agreement with the FRMP, LR and DNSP for the substituting of Type 18, only, where the DRSP has financial interest for interval periods applicable to demand response.</p>
14.1	Deletion of 'Jurisdiction' and replaced with "retailer".	Noted
14.2.1	Inclusion of the words "or End User transfer,".	Noted
14.2.2	Inclusion of the words "or End User transfer,".	Noted
14.2.2(b)	New clause "Utilise a reason code of '67' for End User transfers,".	Origin questions the likelihood that a MDP may substitute utilising type 67 (customer Reads) for a MRIM, given customer reads are not usually provided for interval meters.
14.3(g)	Addition of the reason code 67.	Noted

## 6. Glossary and Framework

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

## 7. B2B Guide

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

6.6.2(a)	Inclusion of the DRSP role.	Noted
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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.	Noted
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u> .	Noted
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u> .	Noted
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	Noted
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	Noted
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	Noted
Additional Comment for Appendix B Table 1	Inclusion of Life Support Notification and Life Support Request	As this procedure is currently under consultation, Origin Energy requests that the Life Support Notification and Request is included in the list of B2B Test Transactions. This is due to the importance of both these transactions in the market.

