

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

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.	
Do you agree that the DRSP will need to know of planned outages?	PLUS ES agrees that the DRSP would want to know about planned outages as this information would support them in managing their portfolio. There are also unplanned outages with which impacted parties are only aware of them when it occurs. This information would also be beneficial to be received by the DRSP, depending on the compliance requirements for bidding etc.
Do you agree that a PIN is the best mechanism for advising the DRSP?	The PIN would not meet all the DRSP requirements without incurring enhancements to participant processes, operational and system.

Question	Participant Comments
<p>Does it need to be modified? Is there a better alternative?</p>	<p>Currently PINs are used in a flexible manner to inform the recipients of the outage and also support compliant operational driven timeframes. There is no current requirement to provide the planned outage notification in real or near real time.</p> <p>One suspects the DRSP's requirements would require more near real time updates of planned outages to support their bidding and compliance – To achieve this objective, costly and resource intensive enhancements would be required to develop operational and system processes to support this.</p> <p>The PIN would require the DRSP to be B2B enabled for an industry consistent and efficient process. Otherwise, existing B2B Market Participants would have to develop and implement different mechanisms to provide the information to DRSPs in addition to B2B.</p> <p>A better alternative would be for the customer to inform the DRSP. The DRSP could then determine via what mechanism they would like to be notified by all their customers, when they should be notified and how real time they require the notifications. It would almost provide a 1:1 notification process (customer to DRSP) instead of relying on multiple parties to inform of outages.</p>
<p>Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?</p>	<p>PLUS ES believes that the best party to notify the DRSP would be the customer themselves, for the following reason:</p> <ul style="list-style-type: none"> • The WDR mechanism is limited to mostly large or wholesale customers • Planned outages may be initiated by various parties: customer, retailer (metering or Disconnection for Non-Payment) or DNSP

Question	Participant Comments
	<ul style="list-style-type: none"> • The NERR obligates: <ul style="list-style-type: none"> ○ the Retailer and DNSP to provide outage notification to customers. Customer to have received the planned outage notification > 4bus days prior to the outage ○ The Retailer must provide multiple notifications to the customer prior to disconnecting them for non-payment. • Any retailer metering planned outages would be mostly customer initiated and by appointment. • The customer would always know of the planned outage. • The customer could also notify the DRSP of unplanned outage occurrences and duration. • The DRSP could implement mechanisms such as agreements, to ensure that the customer provides them that information, especially as there could be compliance implications.
<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>Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?</p>	

Question	Participant Comments
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 procedures including the B2B Procedures?	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.

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.	
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.	

Section	Description	Participant Comments
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.	
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.	

Section	Description	Participant Comments
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.	
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.	
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.	

Section	Description	Participant Comments
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.	
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.	

Section	Description	Participant Comments
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”.	
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.	

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> .	