

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: Red Energy and Lumo Energy

Submission Date: 17 November 2020

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.	Red Energy and Lumo Energy (Red and Lumo) consider this part of the consultation is out of scope for the Retail Procedures - WDR consultation. This should be run as a separate consultation through the existing 5MS working groups as agreed with the 5MS agreed approach.
Do you agree that the DRSP will need to know of planned outages?	Noting that there is no NERR requirement to provide this information to DRSPs, as such these new parties may choose to agree alternate options with their customers to manage planned and unplanned interruptions. This is out of scope for this consultation.
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?	Changes to the B2B Procedures should follow the normal process, and as such Red and Lumo welcome any new DRSPs to raise any changes they consider necessary through the B2BWG. DRSPs are able to opt to use the existing B2B Procedures or put in place alternate processes. However, Red and Lumo would like to note that DNSPs currently do not use the PIN to notify retailers of their planned outages.
Do you agree that the PIN should be provided to the DRSP by Retailers and Distribution Network Service Providers?	Changes to the B2B Procedures should follow the normal process, and as such Red and Lumo welcome any new DRSPs to raise any changes they consider necessary through the B2BWG. Red and Lumo would like to note that DNSPs currently do not use the PIN to notify retailers of their planned outages and would welcome DNSPs providing these to retailers ASAP.
Do you agree with the proposed amendments to the retail procedures which are included in this consultation package as change marked versions?	Red and Lumo does not support all the changes as proposed. Please see individual feedback for each proposed change as detailed below.
Do you agree with the Change Requests that have been flagged for DRSPs to receive completion notifications?	Red and Lumo support the DRSP having visibility of the completion of these change requests, and want to ensure that this does not go beyond the DRSP having the ability to take any action on these change requests - including reject, object, or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?

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.	Red and Lumo do not support the changes to the B2B Guide. We welcome new DRSPs to join the B2BWG and discuss any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.
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.	Red and Lumo does not support all the changes as proposed. Please see individual feedback for each proposed change as detailed below.
Are there any other changes to the B2B Guide that need to be made to support WDR?	Red and Lumo do not support the changes to the B2B Guide. We welcome new DRSPs to join the B2BWG and discuss any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.
Are there any other WDR related issues which AEMO should consider in respect of the retail procedures including the B2B Procedures?	AEMO should not be making amendments to the B2B Procedures on behalf of DRSPs. DRSPs should register with AEMO, request to be a third party B2B participant and join the IEC/B2BWG to participate.

2. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	Red and Lumo support this change on the proviso that the population and maintenance of the field by AEMO is undertaken in an appropriate timeframe. Please see our response below.
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.	Red and Lumo would like to understand the timing obligations which AEMO will put in place and adhere to update this information in MSATS. The information will need to be updated in advance to ensure that retailers are aware of a DRSP being assigned to a NMI. This timing requirement allows for retailers to change their forecasts/profiles etc in a timely manner. This includes updating the field with the DRSP, changing when a new DRSP takes over, and removing any DRSPs when there are no longer any associated with the NMI.

6.1.8	Inclusion of DRSP role in notification of change.	Red and Lumo support the DRSP having visibility of the completion of these change requests, and want to ensure that this does not go beyond the DRSP having the ability to take any action on these change requests - including reject, object, or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?
6.2.8	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.1.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.2.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.3.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.4.8	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.5.8	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
10.6.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
11.1.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
11.2.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
11.3.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
12.3.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
12.4.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
12.5.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
12.6.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.1.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.2.8	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.3.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.4.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.5.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.6.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.7.8	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
13.8.9	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
14.1.5	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.

14.2.5	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
15.1.4(d)	AEMO to populate fields.	Red and Lumo would like to understand the timing obligations which AEMO will put in place and adhere to for updating this information in MSATS. The information will need to be updated in advance to ensure that retailers are aware of a DRSP being assigned to a NMI. This timing requirement allows for retailers to change their forecasts/profiles etc in a timely manner.
15.1.7	Inclusion of DRSP role in notification of change.	Comments to 6.1.8 apply to this clause.
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	Comments to 6.1.8 apply to this clause.

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.	Red and Lumo support the DRSP having visibility of the completion of these change requests, however as a DRSP does not have FRMP obligations at the site, the DRSP must not have the ability to take any action on these change requests - including reject, object, or raise the Change Request. Furthermore, Red and Lumo would like to confirm that the ability to request any amendments to the tariff will remain between the retailer and the LNSP, and not the DRSP?
2.2.8	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
5.2.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
5.3.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
5.4.7	Inclusion of DRSP role in notification of change	Comments to 2.1.8 apply to this clause.
5.5.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
6.1.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
6.2.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
6.3.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.

7.2.6	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
7.3.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
7.4.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.1.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.2.9	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.3.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.4.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.5.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.6.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
8.7.8	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
9.1.4	AEMO to populate fields.	Comments to 2.1.8 apply to this clause.
9.1.7	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
10.1.5	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.
10.2.5	Inclusion of DRSP role in notification of change.	Comments to 2.1.8 apply to this clause.

4. Metrology Procedure: Part B

Section	Description	Participant Comments
	Document versioning	Effective date should be changed to: 24 October 2021
2.2(j)	Inclusion of DRSP role.	Red and Lumo do not agree to the DRSP being a responsible party for agreeing and subsequently informing the MDP that a previous substitution was inaccurate and that a re-substitution of metering data is required. It is not the role of the DRSP to monitor and challenge or validate the substitutions which are used.
2.2(n)	Insertion of the words “as required or”.	Noted.
3.2(g)	Inclusion of DRSP role.	As per commentary made by Red and Lumo against section 2.2(j), Red and Lumo do not support this change.
3.2(h)	Inclusion of DRSP role.	The wording needs to be amended as follows: The MDP must notify the LNSP, DRSP or, LR and the FRMP for the connection point of any

		Substitution within two business days of the Substitution being carried out. Notification is to be achieved via the Participant metering data file as detailed in the Metering Data File Format (MDFF).
3.3.6	Inclusion of DRSP role.	As per commentary made by Red and Lumo for section 2.2(j), Red and Lumo do not support this change.
3.3.8	Inclusion of DRSP role.	As per commentary made by Red and Lumo for section 2.2(j), Red and Lumo do not support this change.
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,”.	Noted.
14.3(g)	Addition of the reason code 67.	Noted.

5. Glossary and Framework

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

6. B2B Guide

Section	Description	Participant Comments
5.1	Inclusion of the DRSP role in the B2B transactions and Participants table.	Red and Lumo do not support the changes to the B2B Guide. As noted above, we welcome any new DRSPs to join the B2BWG, and propose any amendments to the B2B Procedures and/or B2B Guide through the standard consultation processes.
Table 1	Inclusion of DRSP role as an initiator for PMD Meter Data Process.	Comments to 5.1 apply to this clause.

Table 1	Inclusion of DRSP role as an initiator for VMD Meter Data Process.	Comments to 5.1 apply to this clause.
Table 1	Inclusion of DRSP role as a recipient of Meter Data Notification.	Comments to 5.1 apply to this clause.
6.6.1(a)	Inclusion of the DRSP role.	Comments to 5.1 apply to this clause.
6.6.2(a)	Inclusion of the DRSP role.	Comments to 5.1 apply to this clause.

7. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	Red and Lumo do not support this change. The change in the wording as proposed by AEMO does not align to the National Electricity Rules. Furthermore, should AEMO proceed with the change as documented, this will in effect, exclude DRSPs from becoming a IEC member. We refer AEMO to review NER rule 7.17.6 and the definition of Third Party B2B Participants.
Appendix B, table 1	Inclusion of DRSP role as an initiator for ProvideMeterDataRequest.	Noted.
Appendix B, table 1	Inclusion of DRSP role as a recipient of ProvideMeterDataResponse.	Noted.
Appendix B, table 1	Inclusion of DRSP role as an initiator for VerifyMeterDataRequest.	Red and Lumo do not support this change. This is in line with commentary made by Red and Lumo for section 2.2(j) of the Metrology Procedure Part B.
Appendix B, table 1	Inclusion of DRSP role as a recipient of VerifyMeterDataResponse.	Red and Lumo do not support this change. This is in line with commentary made by Red and Lumo for section 2.2(j) of the Metrology Procedure Part B.
Appendix B, table 1	Inclusion of DRSP role as a recipient of MeterDataNotification.	Noted.