RETAIL PROCEDURES
(WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

FIRST STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: SA Power Networks

Submission Date: 28/10/2020

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?	
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?	SA Power Networks do not support the use of the PIN from the DNSP – see further details below.
Do you agree that the PIN should be provided to the DRSP by Retailers	SA Power Networks do not support the PIN being provided to the DRSP from Distributors.

Question	Participant Comments
and Distribution Network Service Providers?	Current B2B Procedure requirements do not mandate the use of this transaction and SA Power Networks do not have any system capabilities to create or provide the PIN to any market participant.

SA Power Networks suggest that AEMO provide justification (expected volumes of DSRP's and sites likely to provide WDR via the DSRP within each jurisdiction) to allow more accurate assessment of this requirement.

Development of this capability would require significant system and process investment costs by SA Power Networks (not achievable by 24 October 2021), which will ultimately increase costs to customers. With WDR information currently available to SA Power Networks and our understanding of how WDR will operate, we do not believe the requirement or costs involved in providing the PIN are justifiable.

Information related to Planned Interruptions are provided to the impacted customer directly and published on our website. The information published on our website is where Retailers are directed to source current information they may require.

We would expect that the DRSP would be required to actively engage directly with their customer in performing the DRSP role, regularly confirming commitments that the customer is able to provide any demand response. This regular DRSP and customer engagement should include the sourcing of any planned activities (including but not limited to supply outages) that would impact the site and impact on available WDR. Additionally, the DRSP (like Retailers) could use information published on our website to support any information requirements. |
| Do you agree with the proposed amendments to | |

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.	

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 ProvideMeterDataRequest.	
Appendix B, table 1	Inclusion of DRSP role as a recipient of ProvideMeterDataResponse.	
Appendix B, table 1	Inclusion of DRSP role as an initiator for VerifyMeterDataRequest.	
Appendix B, table 1	Inclusion of DRSP role as a recipient of VerifyMeterDataResponse.	
Appendix B, table 1	Inclusion of DRSP role as a recipient of MeterDataNotification.	