

RETAIL PROCEDURES (WHOLESALE DEMAND RESPONSE)

PROCEDURE CONSULTATION

SECOND STAGE PARTICIPANT RESPONSE TEMPLATE

Participant: AGL

Submission Date: 2 Feb 2021

1. Context

This template is to assist stakeholders in giving feedback about the changes detailed in the 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. MSATS Procedures: CATS

Section	Description	Participant Comments
2.9	Inclusion of new participant type DRSP.	Agree with improved drafting.
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.	Agree – 2 B/days provides some headroom for other processes
6.1.8	Inclusion of DRSP role in notification of change.	Agree
6.2.8	Inclusion of DRSP role in notification of change.	Agree
10.1.7	Inclusion of DRSP role in notification of change.	Agree
10.2.7	Inclusion of DRSP role in notification of change.	Agree

Section	Description	Participant Comments
10.3.7	Inclusion of DRSP role in notification of change.	Agree
10.4.8	Inclusion of DRSP role in notification of change.	Agree
10.5.8	Inclusion of DRSP role in notification of change.	Agree
10.6.7	Inclusion of DRSP role in notification of change.	Agree
11.1.7	Inclusion of DRSP role in notification of change.	Agree
11.2.7	Inclusion of DRSP role in notification of change.	Agree
11.3.7	Inclusion of DRSP role in notification of change.	Agree
12.3.7	Inclusion of DRSP role in notification of change.	Agree
12.4.7	Inclusion of DRSP role in notification of change.	Agree
12.5.7	Inclusion of DRSP role in notification of change.	Agree
12.6.7	Inclusion of DRSP role in notification of change.	Agree

Section	Description	Participant Comments
13.1.7	Inclusion of DRSP role in notification of change.	Agree
13.2.8	Inclusion of DRSP role in notification of change.	Agree
13.3.7	Inclusion of DRSP role in notification of change.	Agree
13.4.7	Inclusion of DRSP role in notification of change.	Agree
13.5.7	Inclusion of DRSP role in notification of change.	Agree
13.6.7	Inclusion of DRSP role in notification of change.	Agree
13.7.8	Inclusion of DRSP role in notification of change.	Agree
13.8.9	Inclusion of DRSP role in notification of change.	Agree
14.1.5	Inclusion of DRSP role in notification of change.	Agree
14.2.5	Inclusion of DRSP role in notification of change.	Agree
15.1.4(d)	AEMO to populate fields.	Agree

Section	Description	Participant Comments
15.1.7	Inclusion of DRSP role in notification of change.	AGree
Table 16-C	Inclusion of DRSP role in NMI discovery Access Rules.	Agree

2. 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.	Agree
2.2.8	Inclusion of DRSP role in notification of change.	Agree
5.2.7	Inclusion of DRSP role in notification of change.	Agree
5.3.7	Inclusion of DRSP role in notification of change.	Agree

Section	Description	Participant Comments
5.4.7	Inclusion of DRSP role in notification of change	Agree
5.5.7	Inclusion of DRSP role in notification of change.	Agree
6.1.7	Inclusion of DRSP role in notification of change.	Agree
6.2.7	Inclusion of DRSP role in notification of change.	Agree
6.3.7	Inclusion of DRSP role in notification of change.	Agree
7.2.6	Inclusion of DRSP role in notification of change.	Agree
7.3.7	Inclusion of DRSP role in notification of change.	Agree
7.4.7	Inclusion of DRSP role in notification of change.	Agree
8.1.7	Inclusion of DRSP role in notification of change.	Agree
8.2.9	Inclusion of DRSP role in notification of change.	Agree
8.3.7	Inclusion of DRSP role in notification of change.	Agree

Section	Description	Participant Comments
8.4.7	Inclusion of DRSP role in notification of change.	Agree
8.5.7	Inclusion of DRSP role in notification of change.	Agree
8.6.7	Inclusion of DRSP role in notification of change.	Agree
8.7.8	Inclusion of DRSP role in notification of change.	Agree
9.1.4	AEMO to populate fields.	Agree
9.1.7	Inclusion of DRSP role in notification of change.	Agree
10.1.5	Inclusion of DRSP role in notification of change.	Agree
10.2.5	Inclusion of DRSP role in notification of change.	Agree

3. Metrology Procedure: Part B

Section	Description	Participant Comments
2.2(j)	Inclusion of DRSP role.	Agree with removal of DRSP role from this process.
2.2(n)	Insertion of the words “as required or”.	Agree
3.2(g)	Inclusion of DRSP role.	Agree with removal of DRSP role from this process.
3.2(h)	Inclusion of DRSP role.	Agree with removal of DRSP role from this process.
3.3.6	Inclusion of DRSP role.	Agree with removal of DRSP role from this process.
3.3.8	Inclusion of DRSP role.	Agree with removal of DRSP role from this process.
14.1	Deletion of ‘Jurisdiction’ and replaced with “retailer”.	Agree with change.
14.2.1	Inclusion of the words “or End User transfer,”.	Agree with change.
14.2.2	Inclusion of the words “or End User transfer,”.	Agree with change.
14.2.2(b)	New clause “Utilise a reason code of ‘67’ for End User transfers,”.	Agree
14.3(g)	Addition of the reason code 67.	Agree

4. Glossary and Framework

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

5. B2B Guide

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

6. B2B E-HUB ACCREDITATION AND REVOCATION PROCESS

Section	Description	Participant Comments
2.2.1	Inclusion of DRSP role as a registered participant.	Noted that DRSP has been removed.
2.5		AGL largely agree with changes, however, the drafting is unclear if both the Appendix A and Appendix C forms are required as there is no and/or at the end of 2.5(a).
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>ProvideMeterDataRequest</u> .	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transactions are specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>

Section	Description	Participant Comments
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>ProvideMeterDataResponse</u> .	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transactions are specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>
Appendix B, table 1	Inclusion of DRSP role as an initiator for <u>VerifyMeterDataRequest</u> .	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transactions are specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>

Section	Description	Participant Comments
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>VerifyMeterDataResponse</u> .	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transaction size specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>
Appendix B, table 1	Inclusion of DRSP role as a recipient of <u>MeterDataNotification</u> .	<p>Noted – however, the DRSP could also choose to seek other B2B SOs.</p> <p>While it is understood that the provision of metering information is required it is not entirely clear why a DRSP (who would be a third party B2B participant) is called out for some specific SOs and not others. This degree of details is not contemplated for other 3rd party B2B participants (which would include a DRSP) and no minimum transaction size specified for them.</p> <p>AGL would suggest that this requirement be left more flexible, as it implies that DRSPs cannot undertake B2B SOs other than the ones specified.</p>

7. General

General	Participant Comments
Do you have any other comments to make on the Draft Determination?	