STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

***Participant**:* *Origin Energy*

***Submission Date**: 21st September 2022*

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1. Context

This template is to assist stakeholders in giving feedback about the options detailed in the issues paper associated with the Standalone Power Systems consultation.

The changes being proposed are because of NER rule changes which have occurred requiring changes to AEMO's Retail Electricity Market Procedures.

2. Procedure Drafting Changes

Metrology Procedure Part A

Section	Description	Participant Comments
4.1.2	Completion Timeframes - Corrected table reference	Origin has noted the update- No further comments **4.1.2. Completion ~~T~~timeframes** The completion timeframes for each service are detailed in Table ~~5.~~1. They will be measured from the time a request is received by the *metering installation* to the time of notification of completion of the relevant service by the *metering installation* appears at the communication interface at or near the *metering point(s)* where it is made available for collection.
4.2	Table 1 - Corrected table reference	Origin has noted the update- No further comments **Table 1 ~~Table 5.1~~ Minimum Service Levels, Standards and Completion Rates** Service / Completion Timeframe / Completion Rate Remote Disconnection Service / Completed within 1 minute of the command being received by the *metering installation* / 99.5% completed within Minimum Service Levels

Section	Description	Participant Comments
8(b)	Inclusion of test for clarification	Origin has noted the update- No further comments (b) An acceptable alternative testing practice or test plan for in-service *meter* performance must demonstrate compliance with *Australian Standard* "AS 1284.13: Electricity Metering in-service compliance testing". using the "inspection by attributes" method.
12.4(a)(iii)	New clause to include connection points in a SAPS	Origin has noted the update- No further comments (b) The MC must ensure that *metering data* from the following is transferred to AEMO: (i) *interval metering data* for all loads, including Controlled Loads and calculated *metering data* for type 7 *metering installations* and *non-contestable unmetered loads*; (ii) *accumulated metering data* for all Controlled Loads and Non-Controlled Loads; and ~~(ii)~~(iii) *interval metering data* for *market connection points* for a *market generating unit*, in a *regulated SAPS*.
12.6	Corrected table references	Origin has noted the update- No further comments **12.6. Metering installation Type 7 – s~~S~~ample t~~T~~esting** (a) For the purposes of sample testing type 7 *metering installations*, the MC must ensure that the sample size is determined using Table 2~~3~~.8. The sample is to be selected from Unmetered Devices in the Inventory Table for an MC. (b) The MC must ensure that the sample size for the first two Validation tests is based on a 'normal' sample size indicated in Table 2~~3~~.8. **Table 2 ~~Table 3.8~~ Unmetered Devices in Inventory Table**

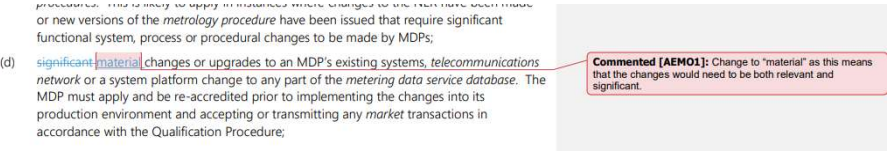
Metrology Procedures Part B

Section	Description	Participant Comments
15.1	New section, calculation of SAPS generation	Origin agrees with the calculation of energy for SAPS generating unit.. Origin also notes and approves of the method of apportioning of the data where there is more than 1 SAPS generating unit. However, Origin would like to understand in instance where the metering data is sent late by one of the SAPS generating unit and all the data from the regulated SAPS is allocated to the other generating unit that has provided the metering data, if the metering data is received at a later date will the apportioning of data be updated accordingly and allocated to both the generating units? Or once the metering data has been apportioned to the generating unit any change /update in data will not impact the allocation and the data will not be revised?
15.2	New section, conversion of non 5 minute interval data on a SAPS	The conversion of 15/30 min interval data to 5 min interval data is consistent with the current converions of data for the NON SAPS NMI's. Origin agrees with the conversion on non 5- min interval data to 5 min nterval data.
15.3	New section, conversion of accumulation metering data on a SAPS	Origin agrees with the conversion of accumulation metering data on a SAPS to 5 min interval data using the flat calculation method. Origin further understands and acknowledges AEMO decision to use the flat calculation method instead of the more complex profiling calculation method

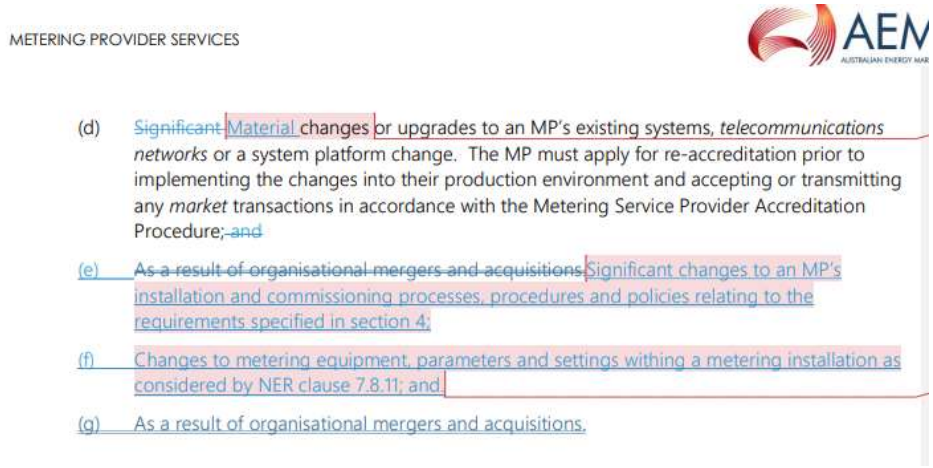
MSATS National Metering Identifier

	Description	Participant Comments
10	New section, TNI convention for grid connected TNIs	Origin agrees that the NMI Procedure is the most appropriate procedure for the inclusion of the TNI Naming convention. Origin notes the updates made to the NMI procedures and the determination of the characters for the TNI naming convention.
11	New section, TNI convention SAPS NMIs	Same as above
12	New section, migration of grid connected NMIs to SAPS	Origin would suggest the below changes to section 12.a.(v) & 12.a.(vi). Origin would like the retailer & MC to be informed at the same time as AEMO. This will give the Retailer/MC time to identify all the NMI's associated with the SAPS and ensure they are set up in the system. (v) Advise AEMO, *the FRMP & MC* of proposed SAPS operational date at least 10 business days before the SAPS is operational. (vi) Provide AEMO*, the FRMP & MC* with confirmation of the actual SAPS operational date within two business days of the SAPS becoming operational.
13	New section, Migration of SAPS NMIs to Grid. Is this section required?	Question? Origin suggests to include this section in the procedure as well. Origin believes at this stage it is difficult to determine the probability of how often a SAPS NMI will migrate to the Grid however believes this cannot be ruled out. Origin would like this included in the procedure to provide the required process/guidance in an instance when a SAPS NMI migrates to the GRID.

SLP MDP Services

Section	Description	Participant Comments
3.9	Changed header to include SAPS	**3.9. Specific mMetering dData pProcessing rRequirements for Special Sites** Subject to an MDP's level of accreditation and system capability to manage *interconnectors, transmission connection points, generation connection points* and cross boundary/border supply points between *distribution networks* or *Local Retailer* regions, each MDP must: (a) perform *transformer* or line loss compensation algorithms, or both, to compensate for losses between the *metering point* and the *connection point*; (b) perform calculations of Datastreams for the requirements of each Special Site; Origin notes and agrees with the update however the marked up procedure does not include SAPS as mentioned in the description.
7.4	Change "significant" to "material"	Review of Accreditation- Origin has noted the update- No further comments  or new versions of the *metrology procedure* have been issued that require significant functional system, process or procedural changes to be made by MDPs; (d) ~~significant~~ material changes or upgrades to an MDP's existing systems, *telecommunications network* or a system platform change to any part of the *metering data service database*. The MDP must apply and be re-accredited prior to implementing the changes into its production environment and accepting or transmitting any *market* transactions in accordance with the Qualification Procedure; **Commented [AEMO1]:** Change to "material" as this means that the changes would need to be both relevant and significant.

SLP MP services

Section	Description	Participant Comments
6.4 (d)	Change “significant” to “material” to align with SLP MDP services	Origin has noted the update- No further comments  METERING PROVIDER SERVICES (d) ~~Significant~~ Material changes or upgrades to an MP’s existing systems, *telecommunications networks* or a system platform change. The MP must apply for re-accreditation prior to implementing the changes into their production environment and accepting or transmitting any *market* transactions in accordance with the Metering Service Provider Accreditation Procedure; ~~and~~ (e) ~~As a result of organisational mergers and acquisitions~~ Significant changes to an MP’s installation and commissioning processes, procedures and policies relating to the requirements specified in section 4; (f) Changes to metering equipment, parameters and settings withing a metering installation as considered by NER clause 7.8.11; and (g) As a result of organisational mergers and acquisitions.
6.4 (e)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Origin has noted the update- No further comments
6.4 (f)	Additions for completeness – confirming existing requirements in the NER and AEMO accreditation checklists.	Origin has noted the update- No further comments

3. Other Issues Related to Consultation Subject Matter

Participant Comments
Origin understands issues have been identified with the current 5MLP system. AEMO is currently considering a “Fit for purpose” methodology. Origin would like to confirm that this will not impact the proposed calculation and conversion of Non 5min interval data to 5 min interval data. Origin understands there are current NMI’s associated with SAPS. Origin is keen to understand will these SAPS NMI be moved to a different TNI based on the new TNI naming convention and if Yes when will these be updated? Once a SAPS is operative if a NMI that is connected to the Grid is moved to a SAPS will the process of advising AEMO/Retailer be included in the section 12.a.(v) & 12.a.(vi) of MSATS National Metering Identifier.