

STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: PLUS ES

Submission Date: 2 Jun 22

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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. Questions

Section	Description	Participant Comments
4.1.3	Do participants agree with AEMO's assessment that MDPs for accumulation meters should provide interval data to the generator MDP and AEMO in a NEM12 file as outlined in option 2(a)?	<p>PLUS ES do not agree with AEMO's assessment as:</p> <ul style="list-style-type: none"> • There is a better and more efficient alternative – Metering the SAPS – see below response • We believe that AEMO have made a few assumptions with respect to the DNSP having a choice with customer metering installation types. Perfect in theory but not practical. This is what we assumed AEMO also meant when Option 1 was discounted as impractical and unreasonable. • The costs to be borne by the MDP for a reducing meter population is not justified <p>PLUS ES does not support either option and strongly recommend for AEMO to consider alternatives. If the choice had to be between 2a or 2b PLUS ES would preference 2a as the better of the two options.</p>
4.1.3	Are there other advantages and disadvantages of the various options that AEMO should consider?	<p>Option 2a</p> <ul style="list-style-type: none"> • Places the onus of profiling on the Type 6 MDP. This would require every MDP performing Type 6 metering services to develop this

Section	Description	Participant Comments
		<p>capability where there is a commitment or likelihood that the network will support a SAPS solution.</p> <ul style="list-style-type: none"> • This would involve considerable implementation costs to Type 6 MDPs but cheaper and less complex than 2b. • Type 6 MDP would already have access to the metering data <p>OPTION 2b</p> <ul style="list-style-type: none"> • Places the onus of profiling on the SAPS Generator MDP. • More costly and complex process compared to Option 2a - The SAPS MDP will have to also build to receive NEM 13 files in addition to the requirements of Option 2a. • Development and operational costs might be a deterrent for a service provider (due to the low volumes).
	<p>Are there other options that AEMO should consider to resolve this matter?</p>	<p>PLUS ES recommends that the most efficient option with the least impact in the current industry environment of change would be for the SAPS unit to be metered.</p> <p>Since converting customer data to 5min at the generator is ONLY required if you do not meter the generator, then all the other more complex options are not required. AEMO will then reconcile the SAPS against the customer NMIs with SAPS TNI (BAU Market Settlement) – as AEMO already have the ability to collect and profile BASIC Meter Data.</p> <p>Ideally all customer metering installations would be upgraded to smart metering - 5 min enabled - but experience has shown this is not a given. Hence a MDP will be forced to go down the path of building to support Basic meter data for the odd reticent customer.</p> <p>Additional benefits:</p>

Section	Description	Participant Comments
		<ul style="list-style-type: none"> Existing MDPs will not need new data forwarding mechanisms to send data to the SAPS MDP The Market will not need a MDP2 Role to allow the data forwarding
4.2.2	Do participants agree that this convention is to be captured in a procedure?	PLUS ES supports having the TNI convention captured in a procedure.
4.2.2	In which procedure or supporting document should it be included?	PLUS ES recommends the TNI convention is included in the NMI Procedure with a new section for the TNI convention. Similar to the section that has included the TNI requirements for Type 7.
5	Has AEMO captured all the changes?	
5	In making the changes to the SLP and Metrology procedures, what are the issues that AEMO should keep in mind/consider?	Changes to the SLP and Metrology procedures will impose changes for the MDP with significant costs. Costs which PLUS ES maintain are unnecessary or can be avoided.

3. Other Issues Related to Consultation Subject Matter

Participant Comments
<ul style="list-style-type: none"> Type 6 accumulation metering has been mentioned throughout but PLUS ES recognises additional processes will be required for Type 5 MRIM metering installations though not as complex as Type 6.