STANDALONE POWER SYSTEMS

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Vector Metering

Submission Date: 2nd June 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. 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)?	At this point we do not agree that MDP's should be required to profile accumulation meter reads. Not enough information on the design of the SAPS solution is available to make an informed choice between the options. We agree with AEMO's conclusion that requiring all meters within a regulated SAPS to be a remotely read interval meter may not be practical due to the complexities related to exchanging meters in a timely manner, and these may delay the commissioning of a SAPS. Our understanding of the SAPS solution design is that profiled interval data from accumulation meters will still be required for market settlement to correctly allocate a customer's consumption to the FRMPs who are responsible over the settlement period.

Section	Description	Participant Comments
		To provide interval data from an accumulation read a process of profiling against an agreed system load profile is required. Currently it is AEMO's role to provide the NSLP for settlement processes. Preparation of the NSLP requires access to all interval data within the SAPS so that this can be removed from the generation load. As individual MDPs within the SAPS will not have access to all interval meter data (only from meters they are responsible for) and given that AEMO does receives all interval data and already has processes that produce a NSLP, and can use this to profile basic meter reads for settlement purposes, we believe they are the best party to continue to perform these functions for a SAPS. Should there be a need for other parties to receive this profiled data e.g. SAPS operator (MSRP), then AEMO could make this available via the existing methods (RM reports). We are of the view that having AEMO continues to produce the SAPS NSLP and perform the profile of accumulation meter data for settlement processes and make this available to parties that need it for other purposes, is preferred over requiring new parties (MDP's) to perform this function.
4.1.3	Are there other advantages and disadvantages of the various options that AEMO should consider?	Requiring all meters within the SAPS to be interval will avoid the complexity introduced by allowing accumulation meters to exist but appears impractical. However, we suggest that the solution design explore this further before discounting it. It is possible that the beneficiaries of the SAPS have the necessary incentives to take on the financial responsibility of resolving

Section	Description	Participant Comments
		customer side defects to allow smart meter exchanges so that a SAPS can be commissioned in a timely manner. Also, in determining the requirements for a specific meters type we recommend that AEMO carefully consider the implications of requiring that all meters within a SAPS must be a smart meter as it is highly likely that remote communications to these meters will be problematic due to geographical issues. Retailers face materially higher reading costs for a manually read smart meter compared to reading a legacy basic meter. Forcing all meters to be exchanged for a smart meter that is to be manually read will realise these higher costs with little benefit to both the market and the customer.
4.1.3	Are there other options that AEMO should consider to resolve this matter?	As above, a viable option 2(c) could be that AEMO calculates and profiles profiled basic meter data for settlement and reconciliation purposes.
4.2.2	Do participants agree that this convention is to be captured in a procedure?	Yes
4.2.2	In which procedure or supporting document should it be included?	'MSATS PROCEDURES: NATIONAL METERING IDENTIFIER'?
5	Has AEMO captured all the changes?	We recommend that a more comprehensive solution design be published. Until that is available it is difficult to determine the scope of the necessary changes.
5	In making the changes to the SLP and Metrology procedures, what are the issues that AEMO should keep in mind/consider?	Before changes to SLP and Metrology procedures are made a more comprehensive solution design is required.

3. Other Issues Related to Consultation Subject Matter

Participant Comments