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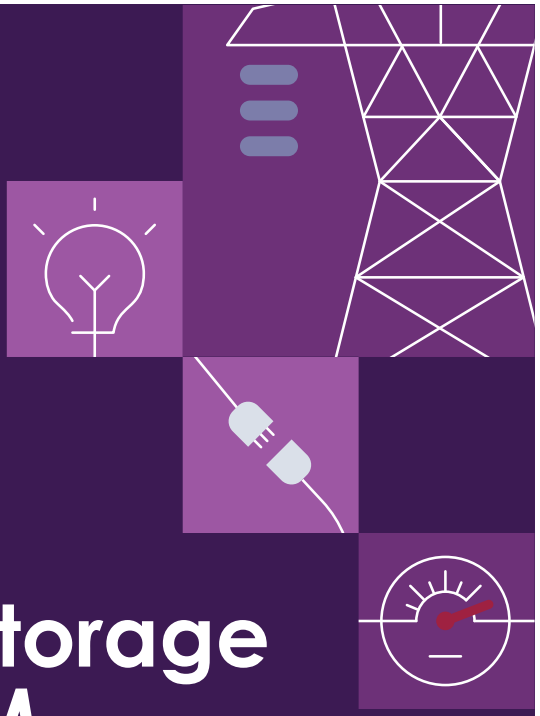

Integrating Energy Storage Systems into the NEM – Retail Electricity Market Procedures consultation

Draft Report

Published: 9 June 2023

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Australian Energy Market Operator Ltd ABN 94 072 010 327

Executive summary and consultation notice

The publication of this Draft Report commences the second stage of the standard consultation procedure conducted by AEMO (**Consultation**) on the proposals (**Proposals**) to carry out change (**Changes**) to the Retail Electricity Market Procedures (**Procedures**) to implement the National Electricity Amendment (Integrating energy storage systems into the National Electricity Market (**NEM**)) Rule 2021 (**IESS Rule**) under the National Electricity Rules (**NER**). This Consultation is undertaken as required by NER 7.16.7 in accordance with the consultation requirements in NER 8.9.2.

Issues Paper

In the Issues Paper published on 6 March 2023, AEMO sought feedback on the following Changes:

1. **National Metering Identifier (NMI) Classification Codes (NCCs)**, including introduction of three new codes (TIRS, DIRS and DGENRATR) and amendments to two further codes (NREG and GENERATR), which AEMO considers necessary to:
   - identify integrated resource systems (**IRS**) and remove the current use of two NMIs for grid-scale storage facilities;
   - appropriately apply market fees and unaccounted-for-energy (**UFE**);
   - incorporate changes relating to the new Small Resource Aggregator category; and
   - enable appropriate compliance monitoring to protect the integrity of market settlements.
2. **Terminology** introduced by the IESS Rule, which needs to be reflected across the Procedures, mostly through minor or administrative amendments.
3. **Other matters**, including an overview of changes to the location and order of embedded network processing, which will not result in Procedure changes.

The Issues Paper also included two Issue Change Forms (**ICFs**) raised through the Electricity Retail Consultative Forum (**ERCF**)**:**

1. ICF_070 alignment of 'Building Name' Field Length in Market Settlement and Transfer Solutions (**MSATS**).
2. ICF_059 Consumer Administration and Transfer Solution (**CATS**) clarifications plus NCC Review.

In response to the Issues Paper, AEMO received 15 written submissions in respect of the Proposals, which raised the following material issues:

- Visibility of the size of the load associated with proposed NCCs of TIRS and DIRS.
- Justification for the proposed NCC of DGENRATR.
- Various issues with proposed amendments to the NREG definition.

Further, AEMO received:

- Extensive feedback for ICF_059 on the NCC subgroup's recommended option to progress an NCC-based solution to the issues identified by the subgroup.
- Broad support for ICF_070.

Draft determination

After considering the submissions received, AEMO's draft determination is to implement the Changes to the Procedures in respect of:

1. The new NCCs of TIRS and DIRS to identify registered IRSs as proposed in the Issues Paper.
2. The new NCC of DGENRATR and amendment to GENERATR as proposed in the Issues Paper, with minor amendments.
3. A revised definition of NREG, which has been amended in response to feedback from submissions.
4. A new appendix in the MSATS NMI Procedure which provides examples of NCC application for different connection configurations. The existing Appendix E is removed, given its purpose was to describe changes to NCCs and participant ID application pre- and post- global settlement. The amendments to terminology throughout the Procedures as required by the IESS Rule.
5. Other minor changes to the Procedures as required by the IESS Rule.
6. ICF_059:
   - Establish a separate consultation process for the main components of ICF_059, to properly understand participant impacts. This relates to visibility of customer generation capability and identification of stand-alone electric vehicle (**EV**) charging stations.
   - Amend the Customer Threshold Codes table in CATS to reflect the relevant regulatory instruments in a footnote.
   - Retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the National Energy Retail Law (**NERL**).
7. ICF_070: Change Building Name in the Standing Data for MSATS document to display a 60-character field.

As only two respondents considered that a formal readiness program would be required to support the retail and metering changes for IESS Rule implementation, AEMO will continue to monitor the impact for participants and consider whether further readiness support is required.

Proposed effective dates

On 4 May 2023, the Australian Energy Market Commission (**AEMC**) made its final rule determination[1] to align the commencement of non-energy cost recovery (**NECR**) changes of the IESS Rule with the start of the billing week. Accordingly, AEMO proposes to amend the Procedures to implement the following effective dates:

- 2 June 2024 for the Changes in respect of NCCs.
- 3 June 2024 for the other Changes.

Changes to the footnote in the Customer Threshold Code table in the CATS procedures associated with ICF_059 are proposed to have an effective date of 1 November 2023 in alignment with the Consumer Data Right minor amendment process.

[1] See https://www.aemc.gov.au/rule-changes/implementing-integrated-energy-storage-systems

Procedures requiring amendment

The following Procedures are the subject of the Proposals:

- Retail Electricity Market Procedures - Glossary and Framework (**Glossary and Framework**)
- MSATS Procedures: CATS Procedure Principles and Obligations (**CATS Procedure**)
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs (**WIGS Procedure)**
- Metrology Procedure Part A: Metering Data Validation, Substitution and Estimation (**Metrology Procedure Part A**)
- Metrology Procedure Part B: Metering Data Validation, Substitution and Estimation (**Metrology Procedure Part B**)
- Standing Data for MSATS document (**Standing Data for MSATS document**)
- MSATS Procedures: Metering Data Management Procedures (**MDM Procedures**)
- Exemption Procedure: Metering Installation Data Storage Requirements (**Exemption Procedure**)
- Guide to the Role of the Metering Coordinator (**MC Guide**)
- Service Level Procedure: Metering Data Provider Services (**MDP SLP**)
- MSATS Procedures: National Metering Identifier (**NMI Procedures**)

Consultation notice

AEMO invites written submissions from interested persons on the Proposal and issues identified in this Draft Report to NEM.Retailprocedureconsultations@aemo.com.au by 5:00pm (Melbourne time) on 10 July 2023.

Submissions may make alternative or additional proposals you consider may better meet the objectives of this Consultation and the national electricity objective in section 7 of the National Electricity Law (**NEL**). Please include supporting reasons.

Please note the following important information about submissions:

- All submissions will be published on AEMO's website, other than confidential content.
- Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.
- Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the proposal. Please refer to NER 8.9.1(k). Meeting requests must be received by the end of the submission period and include reasons for the request. AEMO will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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Tables

1. Stakeholder consultation process

AEMO is consulting on the Procedures in accordance with the standard rules consultation procedure in NER 8.9.2. This Draft Report uses terms defined in the NER, which are intended to have the same meanings.

AEMO's process and expected timeline for this consultation are outlined below in Table 1. Future dates may be adjusted and additional steps may be included as needed, as the Consultation progresses.

Table 1 Consultation process and timeline

Consultation steps	Dates
Issues Paper published	6 March 2023
Submissions due on Issues Paper	3 April 2023
Draft Report published	9 June 2023
Submissions due on Draft Report	10 July 2023
Final Report published	18 September 2023

AEMO's consultation webpage for the Proposal is at https://aemo.com.au/consultations/current-and-closed-consultations/integrating-energy-storage-systems-into-the-nem-retail-electricity-market-procedures-consultation. The website contains all previous published papers and reports, written submissions, and other consultation documents or reference material.

In response to its Issues Paper on the proposal, AEMO received 15 written submissions.

As described in the Issues Paper, AEMO has undertaken pre-consultation engagement with the ERCF and continues to undertake extensive stakeholder engagement activities to assist industry in understanding the IESS Rule change implementation process and opportunities to engage with relevant changes to the Procedures. This engagement includes:

- An IESS Working Group,[2] which has been transitioned into AEMO's broader NEM2025 program.[3]
- One-to-one discussions with individual impacted stakeholders.
- A series of information sessions on specific IESS-related policy matters.
- A dedicated webpage[4] and IESS mailbox (IESS@aemo.com.au) for stakeholder enquiries.

AEMO has also undertaken dedicated engagement on the ICF_059 in respect of the visibility of customer generation capability. This engagement included a workshop with industry participants on 26 May 2023 and several one-on-one meetings to better understand participants' views, both on the issue identified and the potential solutions.

AEMO thanks all stakeholders for their feedback on the Proposal to date. AEMO has considered this feedback in preparing this Draft Report. AEMO looks forward to further constructive engagement.

[2] Documentation and minutes available at: https://aemo.com.au/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/iess-working-group

[3] https://aemo.com.au/initiatives/major-programs/nem2025-program

[4] https://aemo.com.au/initiatives/major-programs/integrating-energy-storage-systems-project

2. Background

2.1. NER requirements

AEMO is responsible for the establishment and maintenance of metering procedures specified in Chapter 7 except for procedures established and maintained under NER 7.17.

The procedures authorised by AEMO under NER Chapter 7 must be established and amended by AEMO in accordance with the Rules consultation procedures.

2.2. Context for this consultation

The AEMC made the IESS Rule determination on 2 December 2021, seeking to better integrate storage and aggregate systems into the NEM. The IESS Rule takes a significant step toward a technology agnostic two-way market model for the NEM and delivers extensive changes to registration and classification, dispatch arrangements, NECR, and participation of aggregated portfolios of small resources.

A full overview of changes is included in the AEMC's IESS rule change documentation[5] and AEMO's high-level design documentation[6].

The key changes in the IESS Rule which are relevant to this Draft Report include:

- Introduction of the new **IRP participant registration category**, which will be mandatory for all participants with resources that have both generation and load (above auxiliary load) at a single connection point. In addition to accommodating participation by energy storage facilities, the IRP is a near-universal participant category that may also classify end user connection points and scheduled load, generating units, small resource connection points and ancillary service units.
- Introduction of the new **bidirectional unit (BDU) classification** which will be used by IRPs to classify resources that both generate and consume electricity (beyond auxiliary load)[7]. A new system category, the **IRS,** has also been defined in the NER, covering systems that both consume and generate electricity.
- Transition of the existing Market Small Generation Aggregator participant category to the IRP, as a **Small Resource Aggregator**. A Small Resource Aggregator:
  - May classify small resource connection points (i.e., small generating units and small BDUs).
  - As part of initial release on 31 March 2023, is able to participate in Frequency Control Ancillary Services (**FCAS**) markets, where it satisfies the technical requirements to do so.
- Changes to **NECR**, which will no longer depend on the category in which a Market Participant is registered. NECR will be based on two data streams, adjusted sent out energy (**ASOE**) and adjusted consumed energy (**ACE**), removing the ability of a participant to net energy flows at a connection point or among its connection points (as currently occurs for units other than grid-scale storage). An example of the changes to arrangements for NECR is provided in AEMO's IESS high-level design.

[5] https://www.aemc.gov.au/rule-changes/integrating-energy-storage-systems-nem

[6] https://aemo.com.au/initiatives/submissions/integrating-energy-storage-systems-iess-into-the-nem

[7] Units which cannot linearly transition from a state of charge to discharge due to a dead-band (typically pumped hydro) will continue to be classified as both a scheduled load and scheduled generating unit, noting the participant will still need to re-register as an IRP.

The change includes a new defined term, Cost Recovery Market Participant, which covers all Market Participants other than Market Network Service Providers and Demand Response Service Providers (**DRSPs**). UFE for a local area is to be allocated to all market connection points in the local area, not just those classified as market load. The Issues Paper outlines the implications of the NECR changes for the location and order of embedded network processing. These changes do not involve Procedure amendments.

- Extensive changes to terminology to reflect the changes to the NER and to improve consistency.

An IRP will be the financially responsible Market Participant (**FRMP**) for connection points which it has classified. The IESS Rule provides that:

- An IRP has the same obligations as a Generator. The IRP is taken to be a Generator in respect of registered generating units which the IRP has classified as scheduled, semi-scheduled or non-scheduled generating units (taken to be a Scheduled Generator, Semi-Scheduled Generator or Non-Scheduled Generator respectively).
- An IRP has the same obligations as a Customer. The IRP is taken to be a Market Customer in respect of end user connection points which it has classified as its market connection points, or connected plant which it has classified as scheduled load. The IRP may become authorised as a retailer, with access to the same functions in retail systems as other retailers.
- An IRP, in its capacity as a Small Resource Aggregator, may classify the connection points of small generating units and small BDUs (collectively termed 'small resource connection points'), with similar obligations to existing Market Small Generation Aggregators (e.g., operating as wholesale market only participants, with the small generating unit or small BDU required to be on its own connection point, with no retail customer load).
- An IRP may classify registered BDUs as scheduled or non-scheduled BDUs. The IRP is taken to be a Scheduled IRP or Non-Scheduled IRP in relation to these units respectively.

IRPs in the FRMP role for a connection point will be entitled to access and perform all the same functions in the MSATS system as any other FRMP is able to perform today, including:

- Classification of market connection points (including small resource connection points).
- Access to NMI standing data and visibility of roles associated with a NMI (e.g., Metering Data Provider (**MDP**)).
- Access to NMI discovery (where authorised).
- Use of metering and customer switching processes.
- Appointment of Metering Coordinator.

Further, the IESS Rule makes a number of amendments to NER Chapter 7, which AEMO considers will not require updates to the Procedures (these are listed in the Issues Paper).

2.2.1. Implementation timing

The IESS Rule is being implemented over three releases:

- The first release on 31 March 2023 provides for Small Generation Aggregators to provide FCAS.

- The second release on 9 August 2023 introduces (opt-in) aggregate dispatch conformance for participants with two or more technologies behind the connection point[8].
- The final release commences on 2 June 2024 for NECR changes and 3 June 2024 for full implementation of the IESS Rule. This split commencement is the result of a recent AEMC final determination to align the implementation of the NECR changes with the start of the billing week[9].

Only the final release is relevant to this Consultation.

2.3. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (NEO) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law as:

> to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:
>
> (a) price, quality, safety, reliability and security of supply of electricity; and
>
> (b) the reliability, safety and security of the national electricity system.

[8] The timing for aggregate dispatch conformance has been delayed to 9 August 2023 to align with the Fast Frequency Response (FFR) project registration process and provision of bids in advance of the rule commencement, allowing implementation efficiencies for AEMO and participants.

[9] See https://www.aemc.gov.au/rule-changes/implementing-integrated-energy-storage-systems

3. List of material issues

The key material issues arising from the Proposal or raised in submissions or consultation meetings are listed in Table 2.

Table 2 List of material issues

No.	Issue	Raised by
1.	Visibility of load at TIRS and DIRS connection points	Multiple respondents
2.	Justification for DGENRATR	AusNet Services
3.	Various issues with proposed amendments to NREG definition	Multiple respondents
4.	ICF 070 - Increase 'Building Name' Field Length in MSATS	AusNet Services
5.	ICF 059 - CATS clarifications and NMI Classification Code Review	Multiple respondents
6.	ARENA submission	ARENA

A detailed table of issues raised by stakeholders in written submissions to the Issues Paper, together with AEMO's responses, is contained in Appendix B.

Each of the material issues in Table 2 is discussed in Section 4.

4. Discussion of material issues

4.1. Visibility of load at TIRS and DIRS connection points

4.1.1. Issue summary and submissions

The feedback on the Issues Paper queried how participants would identify whether a site was a Small or Large customer for the new NCCs of TIRS and DIRS, as well as the amendment of the existing NCC of NREG. Respondents sought to clarify how industry will determine the size of the load for these types of connection points.

Given that the considerations are different as between exempt (NREG) and registered (TIRS and DIRS) sites, this Section 4.1 deals only with the visibility of loads at TIRS and DIRS sites. Section 4.3 addresses the relevant issues in respect of NREG.

The specific issues raised regarding TIRS and DIRS include:

- Intellihub noted the IESS Rule change did not make changes to obligations in relation to customer contracts, customer protection and metering installation timeframes, which are dependent on the size of the load. Further, Intellihub noted that without visibility of the load, the market participant's and customer's rights and obligations are not clear. Similarly, AGL identified potential regulatory obligation issues if the proposed DIRS classification did not distinguish between Small and Large.
- Telstra Energy noted that the new TIRS and DIRS codes do not distinguish between Small and Large consumption levels. This factor may lead to difficulty in achieving small customer compliance across various regulatory instruments and obligations.

The respondents proposed different approaches to identify the size of the load:

- Intellihub proposed an option of separately identifying load and generation aspects of the connection point, instead of combining them in the same field.
- AGL proposed the concept of a Small DIRS and Large DIRS classification.

4.1.2. AEMO's assessment

Key concepts

This Section 4.1.2 outlines a few key concepts to support understanding of AEMO's assessment.

An IRS is a bidirectional system which may include a combination of generating units, BDUs and/or load. The definition of IRS includes and of the following:

- a system comprising one or more BDUs (and which may also comprise one or more generating units or other connected plant that is not part of a BDU); and
- a system comprising one or more generating units where the connection point for the system is used to supply electricity for consumption on the system side of the connection point, except to the extent that the consumption is auxiliary load.

DIRS and TIRS are only intended to be assigned to **registered** IRSs - that is, IRSs in relation to which a person is required to register with AEMO as an IRP. Such registration is required unless:

- A standing exemption applies. A standing exemption is available to a person who owns, operates or controls an IRS with a nameplate rating of less than 5MW when fully connected to a transmission system or distribution system.

- AEMO approves an application for exemption. An application for exemption is available to a person who owns, operates or controls an IRS with a nameplate rating of less than 30MW (other than an IRS which comprises or includes a BDU with a nameplate rating of 5MW or greater).

Under the **current** arrangements:

- Large-scale energy storage units are registered as both a Market Customer and Market Generator, with separate NMIs for the load and generation. Typically, the NMIs are assigned NCCs of WHOLESAL and GENERATR respectively.
- Connection points which include both a large-scale generating system and load are less common. The NCC applied depends on how the plant on site is registered and the physical set-up of the site (e.g., WHOLESAL + GENERATR or, less commonly, LARGE + GENERATR). Generally, such arrangements would instead involve an exempt generating system where the generation is for use by the load. Accordingly, such arrangements would not be registered and NCC of LARGE would be assigned. These sites will not transition to TIRS or DIRS.

Under **IESS**, an IRP must register in relation to an IRS, unless it is exempt. There is a single NMI for the connection point which is assigned TIRS or DIRS, rather than a combination of WHOLESAL/LARGE and GENERATR, as is currently the case. TIRS and DIRS are assigned by AEMO as part of the formal registration process.

The SMALL and LARGE NCCs are referenced in Table 4-D of the CATS Procedures. They are parameters used to define the change reason code, the application timeframe and the objection rules. Table 4-D defines SMALL and LARGE by the consumption threshold relevant for each jurisdiction. The description is consistent with the relevant definition in the NERL and jurisdictional instruments (see Table 3).

Table 3 Jurisdictional thresholds for LARGE and SMALL NCCs

NCC	Description		Jurisdiction
LARGE	Business Customer	>=100MWh	Australian Capital Territory, New South Wales, Queensland
		>=150 MWh	Tasmania
		>=160 MWh	South Australia, Victoria
SMALL	Business Customer	<100 MWh	Australian Capital Territory, New South Wales, Queensland
		<150 MWh	Tasmania
		<160 MWh	South Australia, Victoria
	Residential Customer	Any MWh	All

In this regard:

- A Large customer is considered a Business Customer who consumes energy at business premises at or above the upper threshold (business premises means premises of a business customer, other than premises used solely or principally for personal, household or domestic use).
- A Small customer can be:
  - A Business customer who consumes less than the volume of energy described in Table 3.
  - A Residential customer (residential customer means a customer who purchases energy principally for personal, household or domestic use at premises).

The classification of LARGE and SMALL impacts a range of obligations, including the notifications for outage timeframes, installation timeframes and malfunction resolution and minimum specification of the meter.

Visibility of load at TIRS and DIRS connection points

There are two relevant categories of load (excluding auxiliary load) which may be associated with a registered IRS:

- Load used by a BDU to create the source of energy converted by the production unit to electrical power (i.e. charging load for a BDU). A BDU is a production unit that consumes electricity. A production unit is defined as plant used in the production of electricity and all related equipment essential to its functioning as a single entity.
- Other load for equipment onsite which is not associated with a BDU, such as load for a factory or industrial process.

AEMO does not consider that the NCC is required to provide visibility of the size of load at TIRS and DIRS connection points, for the following reasons:

- Registered IRSs are not connection points where there is a retailer as FRMP – the party in the FRMP role is an appropriately-registered IRP. The FRMPs assigned to TIRS and DIRS connection points are registered in relation to the IRS. The FRMPs are not transferable via the FRMP change process (they must first go through a separate process with AEMO). Accordingly, there is no clear need for participants which are not registered to the IRS to understand the size of the load. These participants have no obligation in relation to the site. The FRMP associated with the site will have the energy data which it requires to understand the size of the load.
- Generally, AEMO considers that registered IRS sites would not be associated with small customer loads. Accordingly, small customer compliance requirements are not likely to be relevant (Telstra raised a related compliance point during the Consultation). As the FRMP at the IRS connection point is not a retailer, retailer obligations are irrelevant.
- A respondent notes that under current arrangements, "the NMI that is registered for the load will be classified as SMALL or LARGE which allowed market participants to understand what obligations, customer contract and protections must be afforded to this NMI". Generally, this is not the case for (what will become) **registered** IRS connection points (the load side NMI is typically assigned WHOLESAL). As described above, the more common arrangement is a large customer with large **exempt** generation on site. In these cases, the NCC will continue to be LARGE or SMALL.

4.1.3. AEMO's conclusion

AEMO does not consider that the proposed NCCs of TIRS and DIRS should be amended to provide visibility of the load at registered IRSs.

Accordingly, AEMO's draft decision is to retain the new NCCs of TIRS and DIRS as proposed in the Issues Paper, with minor changes for clarity (Table 4).

Table 4 Proposed definitions for NCCs of TIRS and DIRS

NCC	Rationale for change	Proposed definition
TIRS	**New code** to identify registered transmission-connected IRS and replace existing requirement for two NMIs	*Connection point* associated with an ~~registered~~ *integrated resource system* (IRS) registered with *AEMO* that is connected to the *transmission network.* This *NMI* Classification is to be assigned by *AEMO* from the IRS registration approval date.
DIRS	**New code** to identify registered distribution-connected IRS and replace existing requirement for two NMIs	*Connection point* associated with an ~~registered~~ *integrated resource system* (IRS) registered with *AEMO* that is connected to a registered network other than a *transmission network* or embedded network. This *NMI* Classification is to be assigned by *AEMO* from the IRS registration approval date.

4.2. Justification for DGENRATR NCC

4.2.1. Issue summary and submissions

AusNet Services does not agree with the proposed inclusion of the new NCC of DGENRATR or the consequential amendments to GENERATR, because AusNet Services considers:

- The new classification is not specific to or justified by the IESS Rule change.
- The new classification will require manual work and system configuration changes to implement.
- The distinction between transmission and distribution connected generators is potentially difficult to make, because of the different voltage thresholds at the transmission assets and the complexity of the special site metering requirements.
- The information in respect of whether a generator is distribution or transmission connected can be derived by AEMO from network topography and other standing data.

4.2.2. AEMO's assessment

As context:

- AEMO proposed the new code DGENRATR to distinguish registered distribution-connected generating systems from registered transmission-connected generating systems, for the purpose of AEMO's settlement process and UFE allocation.
- The existing GENERATR code is proposed to be amended to apply to transmission-connected generating systems only. Consumption flows for distribution-connected generating systems will attract UFE for trading intervals in which consumption is recorded.

AEMO considers that this Change is linked to the IESS Rule, because:

- The changes to UFE allocation for generators form part of the IESS Rule.
- AEMO needs to distinguish between distribution and transmission connected generating systems to accurately reflect the new requirements.

AEMO recognises that, in many cases, it is possible to identify whether a generating system is connected to the distribution or transmission network by using the LNSP field. However:

- This is problematic for sites where the LNSP is both a DNSP and TNSP.
- As noted in the Issues Paper, AEMO cannot use the LNSP field where transmission connection points are connected below the bulk connection point.

AEMO notes that:

- The assignment of DGENRATR and GENERATR is not based on the definition of distribution and transmission with respect to voltage thresholds.
- TNSP/DNSP responsibility does not align with these thresholds in some cases.

These NCCs are to be assigned based on whether the relevant LNSP is registered as a DNSP (for DGENRATR) or TNSP (for GENERATR). In the case that an LNSP is both a DNSP and TNSP, the NCC assignment for a particular generating system would be determined based on the participant ID (where this distinguishes distribution from transmission).

4.2.3. AEMO's conclusion

As this issue has only been raised by one LNSP, AEMO will seek to engage with AusNet further on its particular concerns in respect of the Proposal.

AEMO's draft decision is to retain the proposed changes to introduce DGENRATR and amend the definition of GENERATR. In addition, AEMO proposes to amend the definitions slightly from the Issues Paper, to ensure the language is consistent with the proposed structure of the TIRS and DIRS definitions, as follows (Table 5):

Table 5 Proposed NCC definitions for DGENRATR and GENERATR

NCC	Rationale for change	Proposed definition
DGENRATR	**New code** to differentiate between distribution and transmission connected generation	*Connection point* associated with a *generating system* registered ~~classified as a *Market Generator*~~ with *AEMO* that is connected to a registered network other than a *transmission network* or embedded network. This *NMI* Classification is to be assigned by *AEMO* from the *Generator* registration approval date.
GENERATR	**Amendment** to allocate code to transmission-connected generation only, given new DGENRATR code above	*Connection point* associated with a *generating system* registered ~~classified as a *Market Generator*~~ with *AEMO* that is connected to a *transmission network.* This *NMI* Classification is to be assigned by *AEMO* from the *Generator* registration approval date.

4.3. Amendment to NREG

4.3.1. Issue summary and submissions

In the Issues Paper, AEMO proposed amendments to the existing NREG definition in order to reflect:

- The extensive amendments to terminology.
- The transition of Small Generation Aggregators to the IRP participant category under the new Small Resource Aggregator label.
- The introduction of the small BDU.

Proposed definition of NREG

Most respondents supported the changes to the definition of NREG. However, some respondents provided feedback and sought clarification (including outside the formal submissions) in respect of the application of NREG and the presence of load (excluding auxiliary load) at these connection points, given the IESS changes.

In particular:

- AGL suggested amendments to the definition for clarity, noting that the initial part of the definition links a connection point associated with a person (defined as a non-registered DER provider) rather than an asset, which AGL considers would be difficult for an LNSP to confirm.
- Vector suggested that "the proposal related to NREG in the NCC, in combination with the Rule change that allows NREG sites to be registered under a single NMI will have the unintended consequence that the classification of the consumption will not be visible in the NCC as is currently the case". Vector noted also that visibility of consumption is important for participants to meet their obligations. This is related to the issue discussed in Section 4.1.

Classification of Small Resource Aggregator connection points as wholesale demand response units

A stakeholder raised questions (outside the formal submissions) about the nature of load at NREG connection points and questioned the rationale for a proposed amendment to the CATS Procedure section 2.9 to list NREG as an NCC, where a DRSP may be assigned. AEMO proposed this amendment to reflect a change to NER 7.15.6(f), which extends baseline data access to Small Resource Aggregators (in addition to the existing retailer access) where the Small Resource Aggregator is the FRMP for the connection point for the wholesale demand response unit (**WDRU**). This extension is accompanied by changes to NER 2.3.6(m) to replace the use of the term "load" with the term "connection point" in the criteria for a qualifying load.

4.3.2. AEMO's assessment

Proposed definition of NREG

In response to the feedback received, AEMO has undertaken a more extensive review of the definition of NREG to simplify the definition and to support consistent application of this NCC.

The purpose of the NREG NCC is to identify connection points which:

- **Connect only systems which are exempt from the requirement to register with AEMO as a Generator or IRP**. This includes small generating units and small BDUs. The NER defines these units as being less than 30 MW and less than 5 MW respectively, incorporated in a generating

system or IRS (as relevant) which is exempt from the requirement to register with AEMO. This may be either a standing exemption or an approved application for exemption in accordance with AEMO's *Guide to Generator Exemption and Classification of Generating Units*[10], which is currently under consultation for the IESS Rule.

- **Only include supply which is either for use by a small BDU (e.g. charging a battery), or auxiliary load**. This requirement forms part of the definition of a small resource connection point and is consistent with the existing definition of NREG, which specifies a connection point associated with a "stand-alone" non-registered embedded generator (the definition of which has been replaced with "non-registered DER provider"). The AEMC confirmed this intent in its final determination, which states: "Small resource aggregators will only be able to classify exempt generating units/bidirectional units where there is a separate connection point (ie no retail load). This change supports the continuation of current aggregator business models (which do not involve retail authorisation)."
- **Are associated with a non-registered DER provider**. The definition of non-registered DER provider excludes connections:
  - For which a micro DER connection is appropriate (micro DER connections are defined in relation to Australian Standard (AS) 4777).
  - Which are not connected to a distribution network, as a non-registered DER provider is a distribution connected unit operator. Embedded networks are included in the definition of distribution network.

These requirements underpin AEMO's revised definition of NREG, which is based on the definition of small resource connection point. AEMO considers that this approach also addresses AGL's comment that the definition should not be associated to a person rather than an asset, as the proposed definition removes the direct reference to a non-registered DER provider, instead focusing on the characteristics of the connection point.

The existing definition of NREG makes reference to requirements in Chapter 5 and 5A. These requirements were intended to identify the non-registered embedded generation that must be included in DNSP registers under NER 5.18B and 5A.D.1A. These requirements have been modified by the IESS Rule to be related to a non-registered DER provider. AEMO's review has concluded that these references are now redundant. Accordingly, AEMO proposes to remove these references.

AEMO's new proposed definition is:

NREG

A *small resource connection point* that is not a *micro DER connection* which *connects* one or more *small generating units* or *small bidirectional units* (or any combination) to a *distribution network*, where the only *supply* to the *connection point* is for use by a *small bidirectional unit* (e.g. charging load) or *auxiliary load*.

[10] https://aemo.com.au/en/consultations/current-and-closed-consultations/guide-to-generator-exemption-and-classification-of-generating-units-consultation

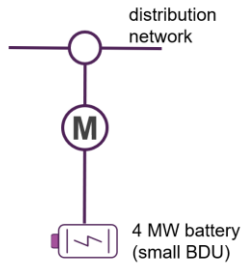
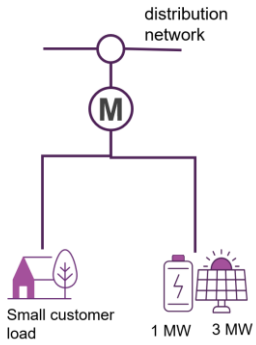
The NER definitions in Table 6 are provided to support understanding of the proposed definition:

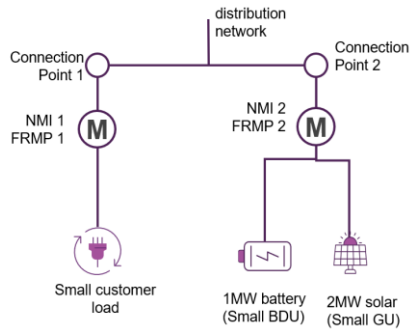
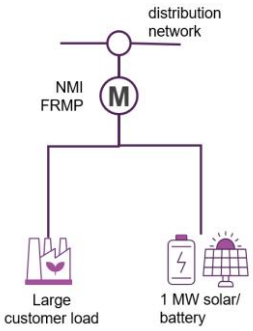
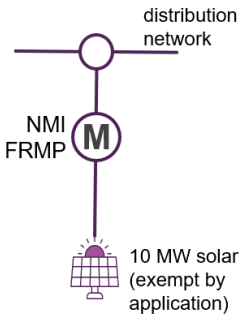
Table 6 NER definitions relevant to proposed NREG definition

Term	Definition
small resource connection point	A *connection point* that *connects* one or more *small generating units* or *small bidirectional units* (or any combination) to the *national grid*, where the only *supply* to the *connection point* is: (a) for use by a *small bidirectional unit connected* at the *connection point*; or (b) *auxiliary load* of a *small generating unit* or *small bidirectional unit connected* at the *connection point*.
small bidirectional unit	A *bidirectional unit*: (a) with a *nameplate rating* that is less than 5 MW; and (b) that is incorporated in an *integrated resource system* in relation to which *AEMO* has given an exemption under clause 2.1A.2 from the requirement to register as an *Integrated Resource Provider*.
small generating unit	A *generating unit*: (a) with a *nameplate rating* that is less than 30MW; and (b) that is incorporated in a *generating system* or an *integrated resource system* in relation to which *AEMO* has given an exemption under clause 2.1A.2 from the requirement to register as a *Generator* or *Integrated Resource Provider*.
distribution network	A *network* which is not a *transmission network*.
micro DER connection	Has the meaning given in clause 5A.A.1: a *connection* between a *distribution connected unit* and a *distribution network* of the kind contemplated by *Australian Standard* AS 4777 (Grid connection of energy systems via inverters).
non-registered DER provider	A *distribution connected unit operator* that is neither a *micro resource operator* nor a *Registered Participant.*

Table 7 provides a few simple examples of the intended application of NREG.

Table 7 Examples of NREG application

Example	Description
	**NREG** Example 1: < 5 MW battery on its own connection point • Connection Point is assigned NREG • Battery is a small BDU as it is <5 MW and is exempt (standing exemption) • Connection point is a small resource connection point as it connects a small BDU where the only supply to the connection point is for use by the small BDU or auxiliary load
	**NOT NREG** Example 2: < 5MW solar and battery sharing a connection point with a small customer load • Connection Point is assigned SMALL • It must NOT be assigned NREG as it is not a small resource connection point (there is supply at the connection point which is not for use by the battery or auxiliary load)

Example	Description
	**NREG (Connection point 2)** Example 3: a small battery and solar installation on a separate connection point from small customer load • Connection Point 2 is assigned NREG (Connection Point 1 must be assigned SMALL or LARGE) • Connection Point 2 is a small resource connection point as it connects a small BDU and small generating unit where the only supply to the connection point is for use by the small BDU or auxiliary load • The battery and solar system are not behind the same connection point as the small customer load. • This represents a typical Small Generation Aggregator/ Small Resource Aggregator connection arrangement.
	**NOT NREG** Example 4: an exempt solar/battery sharing a connection point with large customer load • Connection Point is assigned LARGE • It must NOT be assigned NREG as it is not a small resource connection point (there is supply at the connection point which is not for use by the battery or auxiliary load)
	**NREG** Example 5: < 30 MW exempt solar system on its own connection point (exempt by application to AEMO) • Connection Point is assigned NREG • Connection point is a small resource connection point as it connects a small generating unit where the only supply to the connection point is auxiliary load

Visibility of load at NREG connection points

AEMO notes as follows, regarding stakeholder comments on the lack of visibility of load size at NREG connection points:

- Currently, exempt storage units are treated as small generating units and included in the portfolios of Small Generation Aggregators (with the load component treated as auxiliary supply[11]). These resources are not required to have a separate NMI for the load side of the storage unit (unlike for utility-scale storage).
- The only load at an NREG connection point (excluding auxiliary load), is a load for use by a small BDU. The AEMC's final determination, and the definition of small resource connection point, make clear that a load associated with a small BDU (charging load) is treated as distinct from other load. The AEMC's final determination notes that this allows Small Resource Aggregators to continue

[11] https://www.aemo.com.au/-/media/Files/Electricity/NEM/Participant_Information/New-Participants/Interim-arrangements-for-utility-scale-battery-technology.docx and https://www.aemc.gov.au/sites/default/files/2019-09/ERC0280%20Rule%20change%20request%20pending.pdf

operating as wholesale market only participants, utilising existing business models which do not involve retailer authorisation.

- A small BDU which shares the connection point with other equipment consuming load is not a small resource connection point. The small BDU is not assigned NREG. Rather, the connection point would be assigned SMALL or LARGE, as per the examples in Table 7. In these cases, the load of the small BDU will contribute to the overall load at site, which determines the NCC of SMALL or LARGE based on jurisdictional consumption thresholds. The relevant obligations of SMALL and LARGE where a small BDU is co-located with other equipment consuming energy at a connection point are not impacted by the introduction of BDUs.
- The nameplate rating of the resources at a small resource connection point will determine the potential size of the load for an NREG connection point.

Accordingly, AEMO considers it unnecessary to provide additional visibility of load at NREG connection points by using the NCC. The connection points where there is load in addition to load associated with a small BDU will be classified as SMALL or LARGE, as they are currently.

Classification of Small Resource Aggregator connection points as wholesale demand response units

As noted above, during the Consultation, participant questions arose in respect of the ability of a DRSP to classify a connection point as a WDRU, where a Small Resource Aggregator is the FRMP for the connection point.

NER 7.15.6(f) provides that a Small Resource Aggregator may access the baseline data which relates to a WDRU – if the Small Resource Aggregator is the FRMP for the WDRU's connection point. Before the IESS rule change, retailers alone had this access.

Accordingly, a connection point where a Small Resource Aggregator is the FRMP may be a WDRU.

Therefore, AEMO assesses that the proposed amendment to CATS section 2.9 should be retained.

However, AEMO notes that a connection point will be a WDRU only if AEMO approves a DRSP's classification of a qualifying load as a WDRU under NER 2.3.6(a). For this purpose, under NER 2.3.6(e)(5), AEMO must be reasonably satisfied that the baseline methodology, when applied to the qualifying load, produces a baseline which satisfies the baseline methodology metrics. AEMO notes that this requirement may or may not be reasonably satisfied, depending on the relevant connection point.

AEMO has also sought further advice from the AEMC regarding this amendment.

4.3.3. AEMO's conclusion

Following assessment of submissions and further review of the NREG NCC, AEMO's draft determination is to:

- Replace the definition of NREG in the CATS procedure with: "A *small resource connection point* that is not a *micro DER connection* which *connects* one or more *small generating units* or *small bidirectional units* (or any combination) to a *distribution network*, where the only *supply* to the *connection point* is for use by a *small bidirectional unit* (e.g. charging load) or *auxiliary load*."
- Retain the amendment to CATS section 2.9, enabling DRSPs to be assigned to connection points with an NREG NCC.

4.4. Other matters – ICF 070 Increase 'Building Name' Field Length in MSATS

4.4.1. Issue summary and submissions

ICF_070 proposes to increase the "Building Name" field length in MSATS to align with the aseXML schema and the Standing Data for MSATS document.

Currently, the "Building Name" field length in the MSATS database supports 30 CHAR, whereas:

- The aseXML schema supports 60 characters, as there are two elements defined for Building or Property Name.
- There is a 60 character allowance in the 'Standing Data for MSATS' document.

AusNet Services disagree with this Proposal, with reference to the cost to change its IT systems.

4.4.2. AEMO's assessment

The Building Name field in the Standing Data for MSATS document would increase to display a 60-character field. A change to the schema is required. This increase would enable participants to broaden the available information in respect of the connection point. Such greater detail in respect of the metering location at the connection point would assist participants with metering installation and meter malfunction works.

4.4.3. AEMO's conclusion

AEMO concludes that the Standing Data field in MSATS should be increased to 60 characters. The planned implementation is 4 November 2024.

4.5. Other matters – ICF 059 CATS clarifications and NMI Classification Code Review

4.5.1. Issue summary and submissions

In relation to ICF_059, the Issues Paper sought respondent views on the following topics and corresponding recommendations made by the ERCF NCC Subgroup.

Easy and accurate identification of a customer's non-registered or non-classified generation capabilities

The issue identified by the Subgroup was that "NEM Participants are unable to easily and accurately identify a customer's non-registered or non-classified generation capabilities in the CATS system or procedures".

The Subgroup analysed the following three options:

- The addition of new NCCs into MSATS **(Option 1).**
- The creation of a new MSATS field to explicitly describe generation assets **(Option 2).**
- The expansion of participant access to the distributed energy resources (**DER**) register **(Option 3).**

The Subgroup recommended Option 1. Option 1 involved the creation of new CATS NCCs to identify sites which have a nominal consumption of SMALL or LARGE (as defined in jurisdictional criteria) combined with unregistered / unclassified generation exceeding 10kVA/phase, including:

- GSMALL - Customer with export consumption below nominated threshold AND unregistered and unclassified import generation below nominated threshold.
- GLARGE - Customer with export consumption above nominated threshold AND unregistered and unclassified import generation above nominated threshold.
- The amendment of existing SMALL and LARGE NCCs to exclude sites with generation >=10kVA per phase.

However, most submissions did not support Option 1. Key objections included:

- Extensive impacts for participant systems, processes and compliance with obligations.
- Lack of clarity on what "generation capabilities" are required.
- Existing options for retailers to obtain the information, such as datastream level Average Daily Load (**ADL**), or sourcing the information directly from customers.
- Lack of clarity that the case has been made for significant changes to participant systems to address the issue of misquoting.
- Need for further consultation to support industry in properly understanding the problem and appropriate solution.

Further, the submissions reflected mixed views about whether Option 2 or Option 3 would provide a more effective solution to the issue identified. Several submissions noted that further work is required to properly define and scope the problem and solutions.

Identification of standalone electric vehicle (EV) charging stations

The Subgroup recommendation involved the creation of a new CATS NCC to identify Standalone EV Charging Stations, in support of ESB recommendations. The proposed code was EVCHARGE – Standalone EV Charging Stations (excluding non-standalone EV chargers installed behind a customer's metering installation).

However, most submissions did not support introducing a new NCC of EVCHARGE to identify standalone EV charging stations. Key reasons included:

- Absence of immediate need for the change.
- More analysis being required to understand the issue.
- Duplication, given the information would be captured through the DER Register as part of an in-flight ESB initiative.
- Lack of clarity as to why standalone EV charging stations need to be treated differently to other SMALL or LARGE loads.
- High impacts for participant systems and processes.

Submissions also suggested alternative ways to implement the concept, including:

- EVSMALL and EVLARGE to capture load information relevant to the participant's obligations (Intellihub).
- Introducing a minimum load for the classification (Origin).

Removal of references to 'Residential' and 'Business' associated to SMALL and LARGE NCCs

As the Customer Classification Code already differentiates between Residential and Business, the Subgroup recommended the removal of references to 'Residential' and 'Business' in respect of SMALL and LARGE NCCs (Table 8).

Table 8 Proposed changes to the NCCs of SMALL and LARGE to remove references to 'Residential' and 'Business' (ICF_059)

LARGE	~~Business~~ Customer	>=100 MWh	ACT, NSW, QLD
		>=150 MWh	TAS
		>=160 MWh	SA, VIC
SMALL	~~Business~~ Customer	<=100 MWh	ACT, NSW, QLD
		<=150 MWh	TAS
		<=160 MWh	SA, VIC
	~~Residential Customer~~	~~Any MWh~~	~~All~~

The submissions were mixed:

- Some respondents supported the removal.
- Other respondents objected to the removal, on the basis that more analysis was required to understand the problem.
- Some respondents noted that the table currently reflects the correct jurisdictional thresholds.

In particular:

- Vector noted that "the issue of jurisdictional thresholds was dealt with under ICF-031/CIP-031 in 2020 which updated the table to correctly reflect the designation of NMI classification codes and the jurisdictional thresholds. The table currently reflects the correct jurisdictional thresholds."
- Intellihub considered that the Issues Paper did not "explain in detail what is the current issue or what has changed since AEMO included the references to 'Residential' and 'Business' in the definition of SMALL and LARGE" and that "it is not clear whether this proposed change will reverse the intent of ICF_031."

Minor editorial changes to the Customer Threshold Limits in CATS

The Subgroup recommended that the CATS Procedures should provide the specific jurisdictional limits which relate to the Customer Threshold Codes LOW, MEDIUM and HIGH (Table 9).

Table 9 Proposed changes to CATS Customer Threshold Code table (ICF_059)

Customer Threshold Code	Description	Jurisdiction	Energy Volume
LOW	Consumption is less than the 'lower consumption threshold' as defined in the National Energy Retail Regulations.	ACT, NSW, QLD	<40 MWh
		TAS	<40 MWh
		SA, VIC	<40 MWh
MEDIUM	Consumption is equal to or greater than the 'lower consumption threshold', but less than the 'upper consumption threshold', as defined in the National Energy Retail Regulations.	ACT, NSW, QLD	>=40 MWh <100 MWh
		TAS	>=40 MWh <150 MWh
		SA, VIC	>=40 MWh <160 MWh
HIGH	Consumption is equal to or greater than the 'upper consumption threshold' as defined in the National Energy Retail Regulations.	ACT, NSW, QLD	>=100 MWh
		TAS	>=150 MWh
		SA, VIC	>=160 MWh

The submissions were mixed:

- Most respondents supported the change.
- Some respondents noted that specifying jurisdictional limits would support clarity of the Customer Threshold Codes in CATS.
- Some submissions opposed the change. For example, Red and Lumo noted that "The current definitions of Customer Consumption Thresholds as published are used as the basis of both regulatory obligations as well as numerous Government policy approaches. Most recently when the Federal Government has examined support for small business customers these have been defined as per the existing procedures and State regulations which align as appropriate. The proposed inclusion of the thresholds introduces a risk of conflict and confusion between regulatory instruments and the procedures."
- AusNet Services also objected to the change on the basis of cost implications and suggested that "if this change were to be considered it should be supported by a written explanation on the differences in the jurisdictional laws."

4.5.2. AEMO's assessment

AEMO held a workshop with industry participants on 26 May 2023 and undertook several one-on-one meetings to better understand participants' views, including identified and alternative solutions, in respect of the visibility of customer generation capability,

The workshop considered four potential options for participants to allow retailers to easily and accurately identify a customer's non-registered or non-classified generation capabilities:

1. Enhanced ADL (at datastream level).
2. Bi-directional flag (in MSATS/ NMI Discovery).
3. Enumerated list (new MSATS field).
4. DER Register-enabled solution.

The workshop concluded with a general consensus that two (potentially complementary) solutions were worth considering further, being:

- Enhanced ADL option (which could support better information on energy flows).
- DER Register-enabled solution, probably utilising an enumerated list in MSATS (which could support better information on generation assets).

However, this issue involves significant detail which still needs to be worked through to properly understand the implementation of these options, including impacts on MDP systems and options for accessing and utilising data from the DER Register.

AEMO considers that this issue:

- Is not at the appropriate level of maturity to proceed to draft determination stage.
- Should be shifted to a separate consultation process to ensure participant impacts of the various options are properly understood.

As most participants objected to the implementation of an EVCHARGE NCC, AEMO considers that this issue also requires further consultation to understand the issue and available options.

In respect of the other two ICF_059 issues:

- Minor editorial changes to the Customer Threshold Limits in the CATS Procedure:
  - AEMO considers that specifying jurisdictional thresholds in the Customer Threshold Code table in the CATS Procedure may be problematic, as the specification would require AEMO to undertake a consultation process to update the table when the thresholds change.
  - Rather than duplicating the thresholds in the CATS Procedure, AEMO considers that a footnote referring to specific regulations and jurisdictional instruments would be more efficient.
- Removal of references to 'Residential' and 'Business' in respect of SMALL and LARGE NCCs:
  - AEMO considers that this change would be inappropriate.
  - The NERL defines a small customer as a customer (a) who is a residential customer; or (b) who is a business customer who consumes energy at business premises below the upper consumption threshold.
  - AEMO considers that this change would cause an inconsistency with the NERL, unless the NERL were to be amended.

4.5.3. AEMO's conclusion

AEMO agrees that the relevant systems limit the ability to easily and accurately identify a customer's non-registered or non-classified generation assets, to support quotation and product selection processes by retailers.

However, the feedback from the Issues Paper and the workshop highlighted industry concerns about the proposal in its current form. The proposal to identify standalone EV charging stations using a new NCC also was not supported.

AEMO's determination is to shift these aspects of ICF_059 to a separate consultation process which is separate to the IESS consultation. This approach will enable the issues to be dealt with appropriately and the participant impacts of the various proposed changes to be properly understood.

Regarding the proposal in respect of the minor editorial changes to the Customer Threshold Limits in the CATS Procedure, AEMO's draft determination is to provide reference to specific regulations and jurisdictional instruments, rather than specifying the relevant thresholds (Table 10). This approach will avoid duplication with established instruments and remove the need to undertake an industry consultation if the thresholds change.

Table 10 Draft decision on CATS Customer Threshold Codes table

Customer Threshold Code	Description
LOW	Consumption is less than the 'lower consumption threshold' as defined in the National Energy Retail Regulations.
MEDIUM	Consumption is equal to or greater than the 'lower consumption threshold', but less than the 'upper consumption threshold', as defined in the National Energy Retail Regulations.
HIGH	Consumption is equal to or greater than the 'upper consumption threshold' as defined in the National Energy Retail Regulations.

NOTE:
Refer to regulations 7 and 8 of the National Energy Retail Regulations.
For SA, refer in addition to regulation 5 of the National Energy Retail Law (Local Provisions) Regulations.
For TAS, refer in addition to regulation 4 of the National Energy Retail Law (Tasmania) Regulations.
For VIC, refer to the Energy Retail Code of Practice.

As there are no system implications associated with this change, AEMO proposes for implementation to occur on 1 November 2023 in alignment with the Consumer Data Right minor amendment process.

Regarding the proposal to remove the references to 'Residential' and 'Business' associated to SMALL and LARGE NCCs, AEMO's draft determination is to retain the existing references in the NCC table in the CATS Procedure, to ensure consistency with the NERL.

4.6. Other matters – ARENA submission

ARENA's submission:

1. Supported the redrawing of registration arrangements to integrate IESS.
2. Supported a single NMI for each BDU, but questioned the requirement for one dispatchable unit identifier (**DUID**) per NMI.
3. Requested that AEMO consider retaining a two-DUID model for BDUs, comprising a DUID for import and a DUID for export.

4.6.1. IESS registration arrangements

The IESS Rule introduces a near-universal NEM participant category – the IRP.[12] IRPs can classify BDUs, along with other unit types. This approach is more efficient than the current approach , which requires battery participants to register twice, being, respectively, as a:

- Generator, which enables the participant to classify the generation capability of a battery
- Market Customer, which enables the participant to classify the consumption capability of a battery.

AEMO must implement the IESS Rule registration changes by 3 June 2024.

4.6.2. Support for a single NMI for each BDU

AEMO agrees that removing the current requirement for two NMIs for grid-scale storage connection points is appropriate and consistent with the IESS Rule. As outlined in the Issues Paper and this Draft Report, the two NMIs will be replaced by newly-defined IRS connection points, supported by two new NCCs:

- TIRS for transmission-connected IRS.
- DIRS for distribution-connected IRS.

4.6.3. Retaining separate DUIDs for import and export

ARENA raised concerns about the need for and costs of introducing a single DUID model (with single bidding forms) for batteries.

AEMO has been considering the implementation design and costs for BDUs in consultation with industry through the NEM Reform Program's Implementation Forum, in parallel with this Consultation.[13]

The final BDU model is a single DUID approach with adjustments to:

- respond to industry concerns in respect of FCAS bidding capability and implementation costs, as compared with the pre-existing BDU model; and
- satisfy AEMO's needs for improvements in operation capability.

AEMO considers that the BDU implementation design:

- is being appropriately contemplated through the Implementation Forum; and
- is out of scope for this consultation.

[12] Refer to section 2.2 for more detail on the IESS rule and determination.

[13] NEM Reform Program Implementation Forum materials at: https://aemo.com.au/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/implementation-forum

5. Draft determination on proposal

Having considered the matters raised in submissions to the Issues Paper, as well as at consultation meetings, AEMO's draft determination is to implement the Changes to the Procedures in respect of:

1. The new NCCs of TIRS and DIRS to identify registered IRSs as proposed in the Issues Paper.
2. The new NCC of DGENRATR and amendment to GENERATR as proposed in the Issues Paper, with minor amendments.
3. A revised definition of NREG, which has been amended in response to feedback from submissions.
4. A new appendix in the MSATS NMI Procedure which provides examples of NCC application for different connection configurations. The existing Appendix E is removed, given its purpose was to describe changes to NCCs and participant ID application pre- and post- global settlement. The amendments to terminology throughout the Procedures as required by the IESS Rule.
5. Other minor changes to the Procedures as required by the IESS Rule.
6. ICF_059:
   - Establish a separate consultation process for the main components of ICF_059, to properly understand participant impacts. This relates to visibility of customer generation capability and identification of stand-alone electric vehicle (**EV**) charging stations.
   - Amend the Customer Threshold Codes table in CATS to reflect the relevant regulatory instruments in a footnote.
   - Retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the NERL.
7. ICF_070: Change Building Name in the Standing Data for MSATS document to display a 60-character field.

As only two respondents considered that a formal readiness program would be required to support the retail and metering changes for IESS Rule implementation, AEMO will continue to monitor the impact for participants and consider whether further readiness support is required.

The following Procedures are proposed to be the subject of the Changes, in the form published with this Draft Report, in accordance with the NER:

- Retail Electricity Market Procedures - Glossary and Framework
- MSATS Procedures: CATS Procedure Principles and Obligations
- MSATS Procedures: Procedure for the Management of Wholesale, Interconnector, Generator and Sample (WIGS) NMIs
- Metrology Procedure Part A: Metering Data Validation, Substitution and Estimation
- Metrology Procedure Part B: Metering Data Validation, Substitution and Estimation
- Standing Data for MSATS document
- MSATS Procedures: Metering Data Management Procedures
- Exemption Procedure: Metering Installation Data Storage Requirements
- Guide to the Role of the Metering Coordinator

- Service Level Procedure: Metering Data Provider Services
- MSATS Procedures: National Metering Identifier

Effective date

To align with the IESS Rule, AEMO proposes to amend the Procedures with the following effective dates:

- 2 June 2024 for changes to NCCs.
- 3 June 2024 for the remaining proposed changes.

Changes to the footnote in the Customer Threshold Code table in the CATS procedures associated with ICF_059 are proposed to have an effective date of 1 November 2023 in alignment with the Consumer Data Right minor amendment process.

5.1. Consultation questions

Questions

1. Do you agree with the proposed changes to the Procedures to reflect the requirements of the IESS Rule? If not, please explain the specific draft decision you do not agree with and any proposed alternative solution.
2. Are there any gaps in AEMO's Procedure changes for the IESS Rule?
3. Do you agree with the proposed approach to ICF_070 (Increase 'Building Name' field length in MSATS)?
4. Do you agree with AEMO's decision to shift the substantive components of ICF_059 to a separate consultation process?
5. Do you agree with AEMO's draft decision to amend the Customer Threshold Codes table in CATS to reflect the relevant regulatory instruments in a footnote?
6. Do you agree with AEMO's draft decision to retain references to 'Residential' and 'Business' in the CATS NCC table in accordance with the National Energy Retail Law (NERL)?

Appendix A. Glossary

Term or acronym	Meaning
ACE	Adjusted Consumed Energy
ASOE	Adjusted Sent Out Energy
BDU	Bidirectional Unit
CATS	Consumer Administration and Transfer Solution
DER	Distributed Energy Resource
DNSP	Distribution Network Service Provider
DRSP	Demand Response Service Provider
ENM	Embedded Network Manager
ERCF	Electricity Retail Consultative Forum
ESB	Energy Security Board
EV	Electric vehicle
FRMP	Financially responsible Market Participant
ICF	Issue / Change Form
IESS	Integrating Energy Storage Systems
IRS	Integrated Resource System
LNSP	Local Network Service Provider
LR	Local Retailer
MC	Metering Coordinator
MDM	Metering Data Management
MDP	Metering Data Provider
MP	Metering Provider
MPB	Metering Provider Category B
MSATS	Market Settlements and Transfer Solution
NCC	NMI Classification Code
NECR	Non-energy cost recovery
NEM	National Electricity Market
NEO	National Electricity Objective
NER	The National Electricity Rules made under Part 7 of the National Electricity Law
NERL	National Energy Retail Law
NMI	National Metering Identifier
NSP	Network Service Provider
SLP	Service Level Procedure
TNSP	Transmission Network Service Provider
UFE	Unaccounted-for-energy
WDRU	Wholesale Demand Response Unit
WIGS	Wholesale, Interconnector, Generator and Sample

Appendix B. List of Submissions and AEMO Responses

5.2. Consultation Questions

5.2.1. NMI Classification Code amendments

1. Do you agree that the proposed new NCCs address the requirements for compliance with the IESS Rule outlined by AEMO? If not, please specify your reasoning and any alternative options relevant to the IESS rule.

No.	Question	Stakeholder	Participant Comments	AEMO response
1	1	CitiPower Powercor	Yes. CitiPower Powercor supports the proposed changes	AEMO notes the respondent's comment
2	1	United Energy	Yes. United Energy supports the proposed changes	AEMO notes the respondent's comment
3	1	Intellihub	In principle we have no objections to the proposed new NMI Classification Code (NCC), both new and amended. However, we wish to highlight a potential issue for your consideration: Historically a connection point is largely a load (thereby NCC will be SMALL, LARGE, DWHOLSAL etc), a generator (thereby NCC will be GENERATR, NREG etc) or special case (thereby NCC will be BULK, SAMPLE, XBOUNDRY etc). A key distinction is that a generator connection point cannot have any load (excluding auxiliary load) and that if load is associated with the premises then the load must be registered under a different NMI. The NMI that is registered for the load will be classified as SMALL or LARGE which allowed market participants to understand what obligations, customer contract and protections must be afforded to this NMI. Under IESS, the restriction that a generator connection point cannot have any load (excluding auxiliary load) was removed to promote the entry and operation of storage and hybrid facilities in a flexible and technology-neutral way. AEMO has a requirement to identify specific connections points to meet their obligations (eg calculation of market fees and UFE, market compliance monitoring etc), and accordingly AEMO has proposed changes to the NCC to support this requirement. The IESS rule change did not make any changes to obligations with regards to customer contracts, customer protections, metering installation timeframes etc, which is dependent on the size of the load. Therefore, where a connection point has load then there is a requirement to know the size of the load (eg small or large). We believe the proposed NCC, new and amended, does not provide visibility of the size of the load and this would be an issue because it would not be clear what are the market participant's and the customer's rights and obligations. An option to address the above is to consider that there are two aspects of the connection point that AEMO and market participants are interested in – information on both the load and generation and that these two information are independent of each other. Therefore, instead of trying to combine these two information into a single field (with a long list of allowable values due to the mixture of combinations)	AEMO notes the respondent's comment and has considered these issues in section 4.1

No.	Question	Stakeholder	Participant Comments	AEMO response
			we suggest having two separate fields, one focused on load and the other focused on generation. We understand that this option requires more changes however we believe that this will be a foundational change for future reforms as more connection points become bi-directional energy flow.	
4	1	AGL	Generally AGL supports the changes to NMI Classification for IESS, but notes (below) that the drafting of NREG could potentially eb improved and there is a question surrounding DIRS when associated with a small load.	AEMO notes the respondent's comment and has considered these issues in section 4.1 and section 4.3
5	1	Ausgrid	No comment	AEMO notes the respondent's comment
6	1	Jemena	Yes	AEMO notes the respondent's comment
7	1	Origin	No issue	AEMO notes the respondent's comment
8	1	Telstra	Telstra Energy agree the proposed new NCC's appear to address the requirements for compliance with the IESS rule outlined by AEMO. Telstra Energy do note that the new DIRS and TIRS codes do not distinguish between Large and Small consumption levels and which may lead to difficulty in achieving small customer compliance across various regulatory instruments and obligations.	AEMO notes the respondent's comment and has considered these issues in section 4.1
9	1	Vector Metering	We have some concerns related to the NREG classification. We understand that BDUs at NREG sites have generation capacity less than 5MW and can also have material consumption that is not classified as auxiliary loads. It is apparent that the proposed change to the use of NCC for NREG sites with a single NMI will obscure the size of the consumption and whether the sites is categorised Large or SMALL. The issues paper states "The amended definition of NREG is not intended to change the application of this NCC, aside from the explicit recognition that it may be utilised for the classification of connection points for unregistered small BDUs in addition to small generating units" In our view the proposal related to NREG in the NCC, in combination with the Rule change that allows NREG sites to be registered under a single NMI will have the unintended consequence that the classification of the consumption will not be visible in the NCC as is currently the case. Visibility of consumption is important for participants to meet their obligations. We believe this issue should be addressed so that participants who rely on this are not materially impacted.	AEMO notes the respondent's comment and has considered these issues in section 4.1 and section 4.3
10	1	Alinta	Agreed.	AEMO notes the respondent's comment
11	1	Red Energy and Lumo Energy	Yes	AEMO notes the respondent's comment
12	1	AusNet Services	AusNet understands the need to establish the TIRS, DIRS and NREG new NMI Classification Codes. These codes are structural changes to the market and are required to properly implement the IESS Rule change. In the long run, there implementation will be beneficial. However, we do not agree with the new code DGENRATR and consequently the amendments to GENERATR. The amending Rule does not all mention updating MSATS or NEM procedures to	AEMO notes the respondent's comment and has considered these issues in section 4.2

No.	Question	Stakeholder	Participant Comments	AEMO response
			identify the new types of generators established in the Rule. Therefore, each change needs to be justified by business process benefits. We consider registered generators are not subject at either the distribution or transmission levels \to mass market commercial activity – the type facilitated by MSATS. The information as to whether they are distribution or transmission connected can be otherwise easily derived by AEMO from network topography and other standing data. Implementing this change would require time-consuming manual work and system configuration changes for which the costs would likely outweigh the benefit. Additionally, it is sometimes difficult to distinguish these generators based on: • different jurisdictional voltage thresholds to be transmission assets; and • complicated special site metering, under NER clause 7.8.12. Although the amending Rule treats transmission and distribution connected assets differently as to their connection and network tariff processes, this should not affect the market processes associated with MSATS. Therefore, the new code DGENRATR and the amendments to GENERATR are not required.	
13	1	PlusES	Yes. The proposed new NMI Classification Codes (NCCs) seem to be suitable to address compliance requirements for the IESS Rule.	AEMO notes the respondent's comment
14	1	SA Power Networks	SA Power Networks provide general support.	AEMO notes the respondent's comment

2. Are there any gaps or issues with the proposed NCC definitions as they relate to the IESS Rule, noting that issues beyond the scope of the IESS Rule will be dealt with through separate processes?

No.	Question	Stakeholder	Participant Comments	AEMO response
1	2	Intellihub	As per above, we believe removing visibility on the size of the load for a NMI (eg small or large) is an issue. This issue is not created by the IESS Rule directly, but it is created by the solution that AEMO proposes for the implementation of the IESS Rule. Therefore, we believe this issue is within scope of this IESS consultation. Given that the IESS Rule now allows for load at a grid-scale generator NMI and the industry can expect more bi-directional energy flow NMIs, we believe that this is an opportune time to design a solution that resolves this issue and be foundational for future reforms. We suggest two separate fields, one focused on load and the other focused on generation.	AEMO notes the respondent's comment and has considered these issues in section 4.1
2	2	AGL	AGL considers that having the current drafting for NREG relying on the existence of a non-registered entity before any further tests are completed, is not a clear or definitive mechanism to allow a Distribution network to classify a connection as NREG. The initial sentence links a connection point associated with a person (defined as a *non-registered DER provider*) rather than an asset, which AGL considers would be very difficult for as Distribution Network to confirm. As the person is non-registered it is unclear how a connection point can be identified to meet the initial	AEMO notes the respondent's comment and has considered these issues in section 4.1 and section 4.3 Regarding the comments around DIRS, AEMO notes that DIRS relates to a connection point for a registered IRS, not a non-registered DER provider.

No.	Question	Stakeholder	Participant Comments	AEMO response
			criteria. Therefore, AGL suggests that the initial statement should be: *Connection point* associated with a stand-alone ~~*non-registered DER provider*~~ *distribution connected unit* at which: This provides clarity as it defines a connection point with an asset. Further, by changing the initial sentence the remaining limbs of the definition operate in a clearer manner: **For limb 1**, the criteria to identify a *non-registered DER provider* is no longer part of the definition and relies on the classification of the Small Resource Aggregator, without the interaction of a non-registered DER provider. For limb 1, without the proposed change, the distribution connected unit must have a non-registered person (difficult to identify) and be classified by a Small Resource Aggregator. **For limb 2**, the criteria to link a *non-registered DER provider* to a person who meets the requirements of NER 5.3.1A no longer apply, rather the criteria relate to an asset and a person who meets NER 5.3.1A **or** a non-registered DER provider who makes an election under clause 5A.A.2(c); For limb 2, without the proposed change, a person who meets NER 5.3.1A(c)(2) is a person who has applied for an exemption etc or (3) a non-registered DER provider. Given these requirements, it seems incorrect to initially define these people as non-Registered DER providers. **For limb 3**, the definition flows more appropriately as it then becomes a Distribution Connected Unit with a *non-registered DER provider* who meets the requirements of NER clause 5A.A.2. **DIRS definition** Given the definition of a DIRS, relates to a non-registered DER provider who may install a generating unit greater than a micro generator, but may have a nominal load which would classify them as a ***small*** customer, AGL considers the DIRS definition may not supersede the regulatory protection obligations associated with a ***small*** customer, and as such, there may be a need to have a DIRS classification that can be used to identify a small customer (eg SDIRS) vs a large customer DIRS (eg LDIRS).	
2	2	Jemena	No.	AEMO notes the respondent's comment
3	2	Origin	No issue	AEMO notes the respondent's comment
4	2	Telstra Energy	As addressed in Question 1 (above), Telstra Energy note that the new DIRS and TIRS codes do not distinguish between Large and Small consumption levels and which may lead to difficulty in achieving	AEMO notes the respondent's comment and has considered these issues in section 4.1

No.	Question	Stakeholder	Participant Comments	AEMO response
			small customer compliance across various regulatory instruments and obligations.	
5	2	Vector Metering	We have some concerns related to the NREG classification. We understand that BDUs at NREG sites have generation capacity less than 5MW and can also have material consumption that is not classified as auxiliary loads. It is apparent that the proposed change to the use of NCC for NREG sites with a single NMI will obscure the size of the consumption and whether the sites is categorised Large or SMALL. The issues paper states "The amended definition of NREG is not intended to change the application of this NCC, aside from the explicit recognition that it may be utilised for the classification of connection points for unregistered small BDUs in addition to small generating units" In our view the proposal related to NREG in the NCC, in combination with the Rule change that allows NREG sites to be registered under a single NMI will have the unintended consequence that the classification of the consumption will not be visible in the NCC as is currently the case. Visibility of consumption is important for participants to meet their obligations. We believe this issue should be addressed so that participants who rely on this are not materially impacted.	AEMO notes the respondent's comment and has considered these issues in section 4.3
6	2	Alinta Energy	No Comment	AEMO notes the respondent's comment
7	2	Red Energy and Lumo Energy	No	AEMO notes the respondent's comment
8	2	AusNet	AusNet considers the proposed NCC definitions changes are too extensive already and there are there no gaps as they relate to the IESS Rule.	AEMO notes the respondent's comment
9	2	PLUS ES	Use case where 2 NMIs are no longer required and the 1 NMI gets a NCC of NREG, there is a potential risk that you lose visibility if the customer is to be treated as small or large.	AEMO notes the respondent's comment and has considered these issues in section 4.3 AEMO notes that exempt batteries are currently accommodated by the NREG NCC and aggregated by Small Generation Aggregators. They do not require two NMIs, unlike registered generators.
10	2	SA Power Networks	No comment.	

3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from AEMO to understand the impact of the proposed changes?

No.	Question	Stakeholder	Participant Comments	AEMO response
1	3	CitiPower Powercor	CitiPower Powercor is required to add new NMI Classification Codes into our system and uplift processes to support	AEMO notes the impact for the respondent's systems and processes

No.	Question	Stakeholder	Participant Comments	AEMO response
2	3	United Energy	United Energy is required to add new NMI Classification Codes into our system and uplift processes to support	AEMO notes the impact for the respondent's systems and processes
3	3	Intellihub	If AEMO proceed with the proposed change as is then AEMO should inform market participant where they can get the information about the size of the load for a NMI (eg small or large). We note previously AEMO informed market participant to use the NCC - see final determination from https://aemo.com.au/consultations/current-and-closed-consultations/metering-icf-package	AEMO notes Intellihub's concern and has address the issue of load visibility in sections 4.1 and 4.3.
4	3	AGL	For the IESS NMI classifications there are system and process impacts to identify these connection points.	AEMO notes the impact for the respondent's systems and processes
5	3	Jemena	Jemena will need to complete some system configuration changes and will raise any points for clarification during scoping stage. No further information required from AEMO at this point.	AEMO notes the respondent's comment
6	3	Origin	The changes suggests amendment of existing SMALL and LARGE NCCs to exclude sites with generation >=10kVA per phase, which appears to be an extensive and costly exercise. In general, changes to existing classifications are difficult to manage so should be undertaken only when absolutly necessary. A clear approach to how participants are expected to transition this data is required in order to determine the impact.	AEMO notes the impact for the respondent's systems and processes
7	3	Telstra Energy	Telstra Energy are generally comfortable with the likely system impact of the new NCC's, however, Telstra Energy expect to achieve achieve greater clarity upon MSATS 49.0 Technical Specification (or equivalent artefact) is fully updated to reflect proposed changes.	AEMO notes the respondent's comment
8	3	Vector Metering	Minimal. As a meter provider for the mass market we believe we will be largely unaffected by these new classifications (assuming the issue with NREG raised above is satisfactorily addressed). These classifications mainly relate to sites that are primarily generation sites, not consumption sites.	AEMO notes that the respondent expects a minimal impact from the changes
9	3	Alinta Energy	Alinta believes there will be significant changes to our internal systems to collect/store this information.	AEMO notes the impact for the respondent's systems and processes
9	3	Red Energy and Lumo Energy	To be assessed. Red and Lumo will require clear details of the outcome of this consultation, including any changes to the proposed amendments resulting from this consultation before being able to provide a more complete view of its likely impact. Aside: Red and Lumo are grateful that the IESS team chose to share the settlements-stakeholder-information-session slide pack with the NEM2025 Implementation Forum (IF) as this provides effective insight into the impacts of the changes. We would like to have seen the information session or the slide pack mentioned earlier in the ERCF and	AEMO notes that the respondent requires further information to assess the impacts

No.	Question	Stakeholder	Participant Comments	AEMO response
			the NEM2025-IF for the benefit of those responding to this consultation.	
10	3	AusNet	As discussed above, TIRS, DIRS and NREG are required to properly implement the IESS Rule change, however the new code DGENRATR and consequently the amendments to GENERATR are not necessary or justified. Each distribution and metering business will need to update their systems and processes which comes at a cost to all consumers and should therefore be assessed against the benefit to consumers.	AEMO notes the respondent's view that changes to GENERATR and introduction of DGENRATR are unnecessary. AEMO has addressed these points in section 4.2.
11	3	PLUS ES	Whilst there will be an impact introducing the new NCCs defined in this section of the issue paper, to systems and processes, PLUS ES believes the impacts of the proposed changes should not be significant. Downstream impacts can be further determined once procedural changes are detailed. PLUS ES supports the proposed transition and implementation of the new NCC with the caveat that NCC updates are visible to all participants via C1 reports and CR notifications.	AEMO's notes that the respondent expects that system changes are not significant and that downstream impacts can be assessed once procedure changes are detailed.
12	3	SA Power Networks	These changes will required SA Power Networks to make both process and system changes to support the new NMI Classification Codes. Our current assessment is that this is a Medium size change to implement across our systems (so will require a fair amount of work to support the suggested changes).	AEMO notes that the respondent expects a medium sized impact for system and process changes.

5.2.2. Amendments to terminology

4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for the Procedures?

No.	Question	Stakeholder	Participant Comments	AEMO response
1	4	AGL	AGL has not identified any issues	AEMO notes the respondent's comment
2	4	Jemena	No.	AEMO notes the respondent's comment
3	4	Origin	No issues	AEMO notes the respondent's comment
4	4	Telstra Energy	No comment	AEMO notes the respondent's comment
5	4	Vector Metering	No Comment	AEMO notes the respondent's comment
6	4	Alinta Energy	No Comment	AEMO notes the respondent's comment
7	4	Red Energy and Lumo Energy	No comment.	AEMO notes the respondent's comment

No.	Question	Stakeholder	Participant Comments	AEMO response
8	4	AusNet	AusNet considers that the proposed changes are required to implement the IESS rule change, all except the definition of non-scheduled load. Although the term is used in the amending Rule, it is not relevant to market procedures, like MSATS.	AEMO agrees with AusNet's assessment that non-scheduled load term is not necessarily relevant
9	4	PLUS ES	The terminology impacts seem to be reasonable – Difficult to confirm with any certainty until the marked-up impacts to the Procedures are available.	AEMO notes the respondent's comment and requirement for marked-up procedures to appropriately assess the impacts.
10	4	SA Power Networks	No comment.	AEMO notes the respondent's comment

5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of the IESS Rule?

No.	Question	Stakeholder	Participant Comments	AEMO response
1	5	AGL	Given that IESS is an optional service for participants, the critical readiness is AEMO and AEMO systems, which means that readiness for the specific IESS changes per se are likely not critical. However, the impact on Settlements systems as a result of IESS is another matter. As the IESS change has required a change to all Participant Settlement systems AGL feels that AEMO should monitor and support Participant readiness, as Settlements is a core requirement of market operations.	AEMO notes AGL's comment regarding the need to monitor and support participant readiness for Settlement changes
2	5	Jemena	No comment.	
3	5	Origin	Origin see no reason why a formal market readiness program would be required for this round of IESS changes.	AEMO notes Origin's view that a formal readiness program is not required
4	5	Telstra Energy	Given that the IESS change is optional for particpants who wish to participate, Telstra Energy do not believe an industry wide readiness programme is necessary at this time.	AEMO notes Telstra's view that a formal readiness program is not required
5	5	Vector Metering	As a participant that is largely unaffected by the change we have no view on the need for a formal readiness program.	AEMO notes the respondent's comment
6	5	Alinta Energy	Given the magnitude of change to the Alinta business/systems and other market participants, there would be an expectation that the market operator ensures everyone is good to go via a formal readiness program.	AEMO notes Alinta's support for a formal readiness process
7	5	Red Energy and Lumo Energy	A formal readiness program would give market participants confidence that all aspects have been considered and all testing requirements are satisfied ahead of commencement. It would also allow for the reassessment of the commencement date in the event of	AEMO notes Red and Lumo's support for a formal readiness process

No.	Question	Stakeholder	Participant Comments	AEMO response
			unforeseen developments or conflicts with more pressing market requirements.	
8	5	AusNet	We consider that the costs of a formal readiness program for these changes are not warranted. Normal market and commercial pressures will provide adequate incentives for registered participants to be compliant with the Rule changes. Any failure to comply with the rules will appropriately be at the risk of the market participant.	AEMO notes AusNet's view that a formal readiness program is not required
9	5	PLUS ES	PLUS ES have no view for a formal readiness program as it is currently assumed we will be largely unaffected by the above.	AEMO notes the respondent's comment
10	5	SA Power Networks	No comment.	

5.2.3. Other matters - ICF_070 Increase 'Building Name' Field Length in MSATS

6. Do you agree with the proposed change to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document? If not, please specify your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	6	CitiPower PowerCor	Yes. CitiPower Powercor supports the proposed change	AEMO notes the respondent's support for the change.
2	6	United Energy	Yes. United Energy supports the proposed change	AEMO notes the respondent's support for the change.
3	6	AGL	AGL supports this change.	AEMO notes the respondent's support for the change.
4	6	Origin	No issues	AEMO notes the respondent has cited no issues with this change.
5	6	Telstra Energy	Telstra Energy support the proposed change to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document to increase the 'Building Name' field length in MSATS to align to the aseXML schema and the Standing Data for MSATS document.	AEMO notes the respondent's support for the change.
6	6	Ausgrid	Ausgrid supports this change.	AEMO notes the respondent's support for the change.
7	6	Jemena	Agreed.	AEMO notes the respondent's support for the change.
8	6	Vector Metering	yes	AEMO notes the respondent's support for the change.
9	6	Alinta	Agreed	AEMO notes the respondent's support for the change.

No.	Question	Stakeholder	Issue	AEMO response
10	6	Red Energy and Lumo Energy	Yes	AEMO notes the respondent's support for the change.
11	6	AusNet	AusNet does not support change to increase the length of the rom 30 characters to 60 characters for "building or property names". This is a costly IT change to our systems. Current processes truncate the "building or property names" field at 30 characters – a length that should be able to identify any building or property name. Therefore, we consider that the change to 60 characters is unwarranted and should not proceed.	AEMO notes the respondent's objections to the change, and impact to their systems. We also note their comments about the change being unwarranted, and the reasons for this argument. Due to the support of most of the respondents, we view this change as overall positive to the market. AEMO plans to proceed with this change.
12	6	Plus ES	PLUS ES support the proposed change to increase the 'Building Name' field length in MSATS – alignment between market systems and applications delivers the most efficient outcomes.	AEMO notes the respondent's support for the change.
13	6	SA Power Networks	SA Power Networks support this change.	AEMO notes the respondent's support for the change.

5.2.4. Other matters – ICF_059 CATS clarifications plus NMI Classification review

7. Do you agree that Option 1 would most effectively and efficiently resolve the issue of NEM Participants not being able to easily and accurately identify a customer's non-registered or non-classified generation capabilities? If no, please specify your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	7	CitiPower Powercor	No. CitiPower Powercor believes these changes made in isolation may not be the right answer and should be made in line with broader NEM 2025 changes. This will reduce the inefficiency of changing similar systems and processes on more than one occasion in a short period of time. In the interim retailers should be able to get the information from customers directly.	AEMO notes that the respondent does not support Option 1 and the preference for aligning with broader NEM 2025 changes.
2	7	United Energy	No. United Energy believes these changes made in isolation may not be the right answer and should be made in line with broader NEM 2025 changes. This will reduce the inefficiency of changing similar systems and processes on more than one occasion in a short period of time. In the interim retailers should be able to get the information from customers directly.	AEMO notes that the respondent does not support Option 1 and the preference for aligning with broader NEM 2025 changes.
3	7	Intellihub	In principle we have no objections to the proposed new NMI Classification Code (NCC). However, similar to AEMO's proposed new and amended NCC, we believe there are two aspects of the connection point that AEMO and market participants are interested in – information on both the load and generation and that these two information are independent of each other. Therefore, instead of trying to combine these two information into a single field (with a long list of allowable values due to the mixture of combinations) we suggest having two separate fields, one focused on	AEMO notes the respondent's comment and has addressed the issues outlined in the NCC section.

No.	Question	Stakeholder	Issue	AEMO response
			load and the other focused on generation. We understand that this option requires more changes however we believe that this will be a foundational change for future reforms as more connection points become bi-directional energy flow. An additional benefit of the two field option is that better generation information can be specified, or added later, without complicating the load information. For example instead of defining a single generation threshold (eg 10kVA per phase), different values or bands of values (eg , <5MW, 5MW to 30MW, >30MW etc) can be defined and on the load side it could still be SMALL or LARGE.	
4	7	AGL	As a proponent of Option 1, AGL is supportive of Option 1 and considers it the lowest cost outcome, especially when NMI classifications are being amended. AGL notes Options 2 and 3 may also have benefits and are worthy of further investigation however could result in significant costs and delays. AGL encourages the adoption of Option 1 as a first step to addressing the issue of NEM participants being able to accurately identify a customer's non-registered or non-classified generation capabilities.	AEMO notes the respondent's support for Option 1 and support for further investigating other options.
5	7	Origin	The paper states that "NEM Participants are unable to easily and accurately identify a customer's nonregistered or non-classified generation capabilities in the CATS system/procedures" however • there is no clear definition of what "generation capabilities" that are required to be identified. • CER devices have many capabilities E.g. are they remotely connectable? Are they set to zero export? Generation capacity of the device, or of the system as whole? Is it PV or a wind generator or a diesel generator? • Without clear definition of what 'capability' NEM participants need to be exposed it is difficult to assess any proposed solution. Based on the proposal, it appears generation capabilities mean the potential generation output. We would suggest that further work needs to be done to clearly define what this means.	AEMO notes that the respondent is seeking further definition of "generation capability" to inform the response to the identified issue.
6	7	Telstra Energy	As a proponent of Option 1, Telstra Energy are supportive of Option 1. Telstra Energy note Options 2 and 3 may also have benefits and are worthy of further investigation however could result in significant costs and delays. Telstra Energy encourage the adoption of Option 1 as a first step to addressing the issue of NEM particpants being able to accurately identify a customer's non-registered or non-classified generation capabilities.	AEMO notes the respondent's support for Option 1 and support for further investigating other options.

No.	Question	Stakeholder	Issue	AEMO response
7	7	Ausgrid	No, Ausgrid believes further analysis should be conducted on other options that could be used by retailers to determine if generation systems are connected to NMIs.	AEMO notes that the respondent does not support Option 1
8	7	Jemena	Jemena does not support this change at this time. Jemena agrees that NMI classifications need to become more granular, however, this needs to be scoped and implemented in the context of target state for NEM2025. There is a lack of value in introducing this NMI classification at this time and believes that adequate workaround for participants is in place via the DER register. There is opportunity to review participants' access to this register and placing more robust and uniform requirements for the updating of data to this register. The major concern is that making this change in advance of the NEM2025 initiatives will incur a very high likelihood of additional effort and expense to refactor the changes at a later point. • Changing SMALL/LARGE has significant downstream implications to procedures and rules. This would need to be thoroughly analysed. • Potential for duplication and misalignment of information between DER register and CATs • Complexity- changing a single field to have multiple purposes • There are alternate ways to access the information – e.g. via onboarding There should be a regulatory driver for this change and where is the value add vs. cost associated with rework when NEM 25 landscape/requirements becomes clearer.	AEMO notes that the respondent does not support Option 1 and its views that changes should be aligned with the broader NEM 2025. AEMO notes the respondent's view that there is significant effort and expense associated with Option 1.
9	7	Vector Metering	No. We do not agree with the proposed solution. There are numerous issues with this solution. 1. The proposal to change NCC, especially how 'Large' and 'Small' customers with generation capabilities will be categorized, will result in some Small customers being recategorized as 'Large' will impact the CATS transactions in the CATS procedures. The Cats procedures will need to change as they specifically reference the NCC. Some CATS transactions are only available to Small Customers .e.g. Reversal of a transfer. 2. Changing the NCC as proposed will have a high impact on most participants systems. The NCC is a fundamental piece of information that drives operational and compliance processes, especially in metering businesses but also in retailers and DNSPs. There are over 95 NER obligations that apply specifically to 'Small Customers' and participants have developed systems to refer to NCC to know when these apply and when they	AEMO notes that the respondent does not support Option 1 and its view that there are significant impacts on participant systems. AEMO also notes that the respondent considers that it is unclear if the case has been made for significant changes to address the issue of retailer misquoting.

No.	Question	Stakeholder	Issue	AEMO response
			do not. For example, Meter Installation timeframes where Small and Large have different timeframes. All participants will need to review their processes and systems to revise and either extend the logic to new codes or refer to other fields. This change has been put up as the most cost effective when in our view it is not. Out of all the alternative solutions it is the most expensive and highest risk as it impacts so many participants and so many processes. Alternative solutions can provide a lower risk and isolate the change to participants who want to use this information. 3. It is unclear that the case has been made for the industry to embark on significant changes to avoid the issues of misquoting. The supporting information to the ICF presented at the ERCF suggests that retailers require independent verification of a customer's potential system generation capacity rather than relying on the information provided by the customer when preparing a quote. Any issue related to retailers being 'locked in' to a quote or contract based on incorrect information provided by the customer can be avoided via the retailer's Terms and Conditions. 4. The proposed solution bases a NCC on the size of a customer's generation system to avoid misquoting the customer. i.e. Systems that are greater that 10kW or (10kVA) receive a different classification to customers with a smaller system. However, it is not immediately apparent how knowing this single piece of information without consideration of other factors is useful. For example, knowing that a customer's systems will never export generation into the network, or exports generation is limited (e.g. 5KVA) at a level below the system capacity (10kVA) appears to be equally important for accurate quoting but this will not be visible from the NCC code. For existing sites the volume of the generation from a customers system into the grid is already available in MSATS however use of this seems to have been discounted without proper consideration. In our view. this is still a live option (see below).	
10	7	Alinta	Alinta does not agree the proposed solution. Alinta believes there are numerous issues with this solution. a. The proposal to change NMI Customer Classification - NCC, especially how 'Large' and 'Small' customers with generation capabilities will be categorized, will result in some Small customers being recategorized as 'Large'. This will impact the CATS transactions in the CATS procedures. The CATS procedures will need to change as they specifically reference the NCC.	AEMO notes that the respondent does not support Option 1 and that it considers this option to be extremely invasive for participant systems.

No.	Question	Stakeholder	Issue	AEMO response
			Some CATS transactions are only available to Small Customers.e.g., Reversal of a transfer. b. Changing the NCC as proposed is extremely invasive on most participants systems. The NCC is a fundamental piece of information that drives operational and compliance processes, especially in metering businesses but also in retailers and DNSPs. There are over 95 NER obligations that apply specifically to 'Small Customers' and participants have developed systems to refer to the NCC to know when these apply and when they do not. For example, Meter Installation timeframes, Small and Large have different timeframes. All participants will need to review their processes and systems to revise or extend the logic or refer to other fields. This change has been put up as the most cost effective when in Alinta's view it is not. Out of all the alternative solutions it feels like the most expensive and highest risk as it impacts so many participants and so many processes. Alternative solutions can provide a lower risk and isolate the change to participants who want to use this information. c. It is unclear that the case has been made for the industry to embark on significant changes to avoid the issues of misquoting. The supporting information to the ICF presented at the ERCF suggests that retailers require independent verification of a customer's potential system generation capacity rather than taking the customer's word for it when preparing a quote. Any issue related to retailers being 'locked in' to a quote or contract based on incorrect information provided by the customer can be dealt with by the retailer's Terms and Conditions. d. Alinta believes there is sufficient information in MSATS regarding the customer's volume of generation exported into the market already to support the retailers to avoid misquoting. The supporting information presented to the ERCF by the sub-group disregards this as an option without proper consideration (see below). It is our view that this is still a live option.	
11	7	Red Energy and Lumo Energy	Red and Lumo do not agree that the proposed NMI Classification Codes (NCC) effectively or efficiently address the issue of identifying non-registered or non-classified generation capabilities. MSATS Standing Data already allows participants to identify the presence of import\export through the Datastream Suffix, and the Average Daily Load associated with this datastream indicates the average 'sent out' energy of an export data stream. Consequently, the need for development to manage these values would create significant costs across all market participants, the vast majority of whom would not receive any value from this additional data.	AEMO notes that the respondent does not agree with Option 1 and that it considers MSATS Standing Data already provides information for participants to use for the purpose of identifying generation at customer sites. AEMO also notes that the respondent considers Option 2 would also create costs but would

No.	Question	Stakeholder	Issue	AEMO response
			Alternatively the creation of one or more additional MSATS fields would create similar costs across many market participants, while providing greater flexibility and long-term efficiency than the proposed NCC. Red and Lumo are concerned that there is not enough evidence to support the proposal to create GSMALL and GLARGE NCC with the prefix 'G' to indicate generation (currently proposed with an arbitrary level of generation). This approach will inevitably carry risk that these will be obsolete or conflict with new obligations as the market develops for flexible and non-flexible loads.	provide greater long-term efficiency.
12	7	AusNet	AusNet considers the addition of new NCCs would be the costliest option to implement, because it requires substantive changes to market service systems and other changes to core management systems used by LNSPs to register connection points and create network connection asset data. This in fact is more costly to implement than a new field in MSATS – an option we also consider to be sub-optimal in comparison to option 3, which if shared by AEMO would be the lowest cost and most effective solution. In the AEMC's rule change consultation establishing the DER register, the question of providing DER register information to retailers was assessed. The "register of distributed energy resources" rule determination concluded that the data could not be shared with retailers, in saying: "The Commission considers that there is not a strong case that allowing these parties access to the register would enhance the safety or operation of the national electricity market. Further, it is not appropriate for parties to have access to protected information for commercial purposes. For that reason, the Commission does not recommend that Registered Participants other than NSPs have access to disaggregated information contained in the DER register." We do not consider it appropriate or necessary for AEMO to relitigate, or change the meaning of, the rule change determination as part of this process. Any changes to the rules should undergo the appropriate formal rule change process by the AEMC (and including comprehensive stakeholder consultation). We are concerned that none of the options presented in the ICF adhere to the principles established in the rule determination. The AEMC's final determination on the register of DER stated in relation to privacy concerns by stakeholders that: "it is not appropriate for parties to have access to protected information for commercial purposes". Therefore, we do not support the proposed changes in ICF_059.	AEMO notes that the respondent does not support Option 1 due to costly changes to participant systems. AEMO notes the respondent's preference for Option 3 and that an appropriate rule change process should be followed.

No.	Question	Stakeholder	Issue	AEMO response
13	7	PLUS ES	PLUS ES does not support that **Option 1** (The addition of NCCs into MSATS) for the purpose of ICF_059, as per below points: **The Issue:** *NEM Participants are unable to easily and accurately identify a customer's non-registered or non-classified generation capabilities in the CATS system/procedures.* • This information can be derived by interested participants from **existing** information already available via Market systems and databases, such as MSATS and DER register. • Option 1 will introduce greater complexity in system and business processes- requiring all participants who rely on the NCC field to assess the logic accordingly and make necessary changes. • An option analysis with an associated cost benefit was not made available for participants to evaluate and qualify. To our knowledge the issue has not been quantified/sized or if it is available, it has not been provided. What are the volumes of such NMIs? How often does one need that information? • The approach or preferred option of the subgroup was not visible until late Jan (ERCF presentation) and there wasn't sufficient opportunity to discuss the issue in detail and determine if it should be included in a consultation. That is, there was enough concern in the forum making it evident that the discussion on the proposed had not been exhausted to go to consultation. • The NCC field is also used in determining if a customer is large or small especially from Rules compliance obligations. Whilst the use of the NMI is required knowing if the customer of the NMI is large or small is more important. Additional enumerations to this field could make the determination of the basics more complex. The more complex the logic the greater the likelihood for errors or breakpoints. • GSMALL/GLARGE – in addition to not supporting proposed NCC changes, PLUS ES recognises the requirement for 10kVA limits but is perplexed with the reasoning and the value in the industry. See scenarios below. o A customer has 10kVA of generation on one phase and another customer has 9.8 kVA, why is it important to know that Customer A has a GSMALL NMI as opposed to customer B who will have a NCC = SMALL. o Customer A has 10kVA of generation on a 1 Phase site whilst Customer B has 3 Phases and 9.8 kVA on each phase. Customer A would have NCC= GSMALL and Customer B NCC=SMALL. Attachment A - **Changes to the allocation of Residential sites to the 'SMALL' NCC, as the**	AEMO notes that the respondent does not support Option 1. AEMO notes the respondent's view that Option 1 would create complexity and expense for participant systems. AEMO also notes the participant's view that an options analysis should be undertaken to support the process and its concerns with the process that was undertaken for the ICF.

No.	Question	Stakeholder	Issue	AEMO response
			Customer Classification Code field already differentiates between Residential and Business customers. PLUS ES does not support the proposed change for the below reasons: • The existing residential definition for the 'SMALL' NCC was recently added to the table to ensure that the industry was aligned with Rules/legislation which state that residential customers irrespective of their consumption will be classified as Small. Removing this classification could lead to incorrect interpretations, non-compliances etc, creating downstream issues for market participants and reverting back to where the industry was prior to the change. • The proposed change will require industry participants to remove the changes they recently implemented and then build additional logic to classify a NMI as a Small/Large customer, where the LNSP currently populates the NCC. • The *impact* which requires the definition to be removed has not been clearly articulated, just identified as significant impact. • Does not meet the NEO objective.	
14	7	SA Power Networks	No - SA Power Networks does not support this proposed change or option. **Retailers should source information from the customer directly** – if this information is needed to form part of a retail offer, given the range of DER capabilities and variable options of how these are used by customers (either current or potentially new capabilites), then Retailers should source the information they required directly from the customer at the time of sign up. Accountability for obtaining the required information to form contracts must remain a Retailer obligation and it is unclear why a Q&A process isn't the most efficient way for Retailers to gain the required information they need to determine what product offerings can be presented to customers. Additionally, we would expect that Retailers would require recorded evidence to specific Q&A's (DER being just one import piece of information provided) should they need to go back to the customer to alter contract arrangement. **Accuracy of information** – we agree that Retailers need to understand what DER capabilities customers have at their site and where the Retailer is not able to obtain the information directly from the customer or is concerned about the accuracy of information provided by a customer, then they should be provided access to the most accurate source of information – AEMO's DER Register, which already holds the most detailed information available for all sites (noting that this information is being maintained on a daily basis). **Additional NMI Classification Code values unlikely to be the answer** - industry expects the range of product offerings made available to customer will continue to evolve over the coming years, with a significant program of work just underway to support the NEM 2025 range of intiatives. Given the lack of clarity of what will be required to support industry over the coming years, making changes at this time (ahead	AEMO notes that the respondent does not support Option 1. AEMO notes the respondent's view that retailers should source information directly from customers and that Option 1 would create substantial additional complexity without addressing the identified issue.

No.	Question	Stakeholder	Issue	AEMO response
			of understanding the full set of requirements) will likely result in costly rework for industry or worse, wasted costs for changes made now that do not support the full set of future requirements. Making changes once should be the industries aim (when certainty of requirements is known) and it would appear these changes are narrow focused and piecemeal (noting that from a design perspective, it is unlikely that a single field will be able to ever provide the required information needed by Retailers regarding customers energy needs and usage). **Complexity and Duplication** - the proposal turns a simple field into a complex field which would require multiple variables to be considered (some of which are outside of the LNSP's control and reliant on data provided by MDP's) to determine a field value. Complex fields are costly to build and maintain and we strongly oppose creating costs for industry via duplication of information or effort (noting previous comments regarding "Accuracy of information"). **Changes are not simple** – it appears that the changes have been presented as easy and administrative; this is not correct. A full impact assessment should occur to understand the size of this change to industry and only if significant benefits can be presented (benefits that can not be achieved via simpler and less costly solutions) should these changes be considered further. **Obligation impacts** – we have concerns that a full impact assessment to policy, procedure and system logic has not occurred (given the reliance on small and large classification by industry) and suggest that this should be addressed prior to further consideration of this change.	
15	7	Energy Queensland	Energy Queensland supports efforts to enable more accurate identification of generation capacity at specific connection points, particularly where that will have a meaningful impact to the interactions a retailer would need to have with the customer. However, we note that the proposed changes to National Metering Identifier (NMI) Classification Codes (NCCs)will have significant impacts, including further consultation, and we do not support the proposed Option 1 -the addition of new NCCs into Market Settlement and Transfer Solutions. In our view, NMI classification is fundamental to most system and processes across all participants and adding new values to that field will have far reaching implications across almost all AEMO procedures. For example, each section in the CATS procedures makes reference to the NMI classification - "Conditions Precedent: NMI Classification Code is SMALL or LARGE". As such, we note the significant effort required to identify all references and understand the implications in changing them. Further, Ergon Energy Retail has a large number of sites with greater than10kVAper phase and if implemented, the changes will result in significant system and process impacts to change those values in standing data (and the associated downstream impacts).	AEMO notes that the respondent does not support Option 1 due to extensive system implications for participants.

8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	8	CitiPower Powercor	CitiPower Powercor's strong recommendation is that these changes be considered as part of the broarder NEM 2025 changes.	AEMO notes the respondent's view that the changes should be aligned with NEM 2025
2	8	United Energy	United Energy's strong recommendation is that these changes be considered as part of the broarder NEM 2025 changes.	AEMO notes the respondent's view that the changes should be aligned with NEM 2025
3	8	Intellihub	We believe there are two aspects of the connection point that AEMO and market participants are interested in – information on both the load and generation and that these two information are independent of each other. Therefore, instead of trying to combine these two information into a single field (with a long list of allowable values due to the mixture of combinations) we suggest having two separate fields, one focused on load and the other focused on generation. We understand that this option requires more changes however we believe that this will be a foundational change for future reforms as more connection points become bi-directional energy flow.	AEMO notes the respondent's comment and has addressed the issues outlined in the NCC section.
4	8	AGL	As AGL was a proponent of these changes, AGL has no further proposals to support this outcome. AGL recognises the extended discussion regarding other processes (eg DER Register), but these processes are significantly more expensive and time consuming for no additional perceivable benefit at this time. AGL does, however, not consider this matter closed, but simply a step taken in the development and understanding of a two way market. AGL has not identified another, simple, low-cost alternative to the additional NMI classifications but would not be adverse to exploring further options to address the identified issues.	AEMO notes the respondent's comments.
5	8	Origin	We support Option 2 (DER) or Option 3. Use ADL (avg daily load) at data stream level. What is the problem that we are trying to resolve? The proposed change in option 1 represents an expensive and fundamental change to participant systems and it's not clear what problem it would address.	AEMO notes the respondent's support for Options 2 and 3 and use of ADL at datastream level.
6	8	Telstra Energy	As stated in Question 7, Telstra Energy would not be adverse to continued exploration of Options 2 & 3 as the market develops.	AEMO notes the respondent's comment and support for exploration of Options 2 and 3.
7	8	Ausgrid	Arranging access for participants to the AEMO DER Register would allow participants to assess generator capacities, and would alleviate having data in 2 differeent systems which could fall out of alignment. The use of register level data stream DAL is already updated to MSATS by the MDP. Using this data participants could	AEMO notes the respondent's support for a DER Register solution and support for

No.	Question	Stakeholder	Issue	AEMO response
			determine if there is a larger generator onsite where the load is quite small (eg. rural NMIs with large solar connections). Participant could make updates to their systems to extract this data from MSATS and make assessments when signing up new customers.	using ADL at datastream level.
8	8	Jemena	As above, interim solution is to provide access to the DER register and manage updates to the register so that it stays up to date.	AEMO notes the respondent's support for DER Register access as an interim solution.
9	8	Vector Metering	There are a number of options that in our view provide a better solution to option 1 proposed. In order of lowest cost these are: 1) ADL on the 'B' DataStream contained within the CATS_NMI_DATASTREAM is already available for use. This will provide the average daily generation value that retailers can use in preparing quotes. The supporting material provided to the ERCF suggests that use of ADL on NDS is not sufficient as the DataStream in MSATS is reflecting a net value (Consumption minus Generation). However, this is not the case. Since 5MS MDP's are obligated to establish 'register' level DataStream, which exposes an ADL for both consumption 'E' and Generation 'B'. All meters that are recording 5 minute data (approx. 2 million) have been converted to register level data streams. Over time all remaining meters will be converted to register level DataStream. AEMO has previously stated a desire to move away from 'N'et DataStream as quickly as possible as this allows for more accurate settlement and UFE calculations. Should retailers find generation ADL valuable in quoting there remains an option for industry to accelerate the creation of register level Data Streams for all existing sites with local generation. 2) AEMO to source the required information from the DER register and present it to the retailer as part of the NMI discovery processes. The benefit of this approach is that retailers can have a richer data source available to support accurate quoting. The DER registers hold information about a site and therefore is likely to be the best source (besides the customer) for this information. This would require AEMO to establish an interface to the DER register for the enquiry and would require a schema change to include this into the NMI Discovery report. 3) Create new fields on CATS_NMI_DATA to contain the relevant information that retailers require. This option would need to determine if it is appropriate that details of a customer's systems e.g. capacity of system, should be stored in MSATS. The benefit of this approach is that it is low risk for participants because it avoids changes to NCC and impacting already established processes. Assuming that the DNSP is required to maintain this information adding these new fields to MSATS tables would require 4 CATS CR's (CR2xxx) to be enhanced, as well as changes to other metering reports (NMI Discovery, C4,C7 etc). Participants who are not interested in having this information can use n-1 schema functionality to defer any schema changes.	AEMO notes the respondent's views that ADL at datastream level is already available for use, and that DER Register and new CATS fields are viable options.
10	8	Alinta	An alternative option could be:	AEMO notes the respondent's view

No.	Question	Stakeholder	Issue	AEMO response
			ADL on the 'B' DataStream contained within the CATS_NMI_DATASTREAM is available for use. This can provide an average daily generation value that retailers can use in preparing quotes. The supporting material provided to the ERCF suggests that this is not sufficient as the DataStream in MSATS is reflecting a net value (Consumption minus Generation). However, this is not the case. Since 5MS MDP's are obligated to establish 'register' level Data Streams, which exposes an ADL for both consumption 'E' and Generation 'B'. All meters that are recording 5-minute data (approx. 2 million) have been converted to register level data streams. CATS no longer allows for any transactions that creates or maintains a net 'N' DataStream so over time all remaining meters will get converted to a register level DataStream. AEMO has previously stated a desire to move away from 'N' DataStream as quickly as possible as allows for more accurate settlement and for UFE calculations there remains the ability to accelerate the creation register level DataStreams for all existing sites with local generation.	that ADL at datastream level is available for use.
11	8	Red Energy and Lumo Energy	In addition to aiding participants to identify a customer's non-registered or non-classified generation capabilities, additional MSATS fields could support identification of EV charging capability, maximum capacity of generating units and inverter standards and thereby support Dynamic Operating Envelopes and DNSP planning.	AEMO notes the respondent's support for Option 2
12	8	AustNet	Option 3 would be the better alternative, if AEMO were to share their extensive DER register data resources (or subset thereof) with the registered FRMP. In order to satisfy privacy concerns limiting the data subset would be appropriate.	AEMO notes the respondent's support for Option 3
13	8	PLUS ES	PLUS ES believes that there are alternative options better aligned to deliver overall efficiencies to the proposed Option 1. • Distributed Energy Resources (DER) register (Option 3) – PLUS ES supports this option as the most efficient and optimal solution to meet the NEM reform requirements. Recognising that enhancements will need to be delivered. This register was created to record and provide information about DERs. Generating units, EV charging stations, Batteries and any other clean energy technological innovation can be captured in this DBoR, ○ Providing viewing access to industry participants who have a financial interest in the NMI, would be an efficient option to support operational requirements such as product offerings, network stability or management of data. ○ The DER register can be maintained as the source of truth (outside the customer), as it holds information about the NMI. Introducing a replica of information already recorded, increases the likelihood of data derogation and misalignment. ○ The DER register would be able to provide participants additional details in addition to the arbitrary assumed generating capacity which the proposed NCC could only deliver. It could provide a view if there is solar, battery, EV installed at the site etc and all the recorded attributes of the DER which are being captured. ○ Increasing the use of the DER register could also mitigate requirements for jurisdictions to create their own localised stand-alone CER registers etc. • In the absence of DER access, PLUS ES understand that some participants may have a need to identify Generation on a NMI and the size. That information is	AEMO notes the respondent's support for Option 3 as an alternative to Option 1 and its view on other information that is available, including ADL at datastream level.

No.	Question	Stakeholder	Issue	AEMO response
			currently available to them via their customers or market systems which they could make readily available to their operations as required; an alternative to imposing a cost across all market participants. Information available includes – Datastreams for B channels, ADL at register levels i.e. generation, consumption etc	
14	8	SA Power Networks	Yes – please see comments within Q7 response.	AEMO notes the respondent's comment.
15	8	Energy Queensland	Energy Queensland considers that the proposed changes above are unlikely to solve the underlying problem for retailers of how to accurately identify the generation capacity connected behind a NMI. As such, we support Option 3 and consider that expanded access to the DER Register is a more appropriate solution. We acknowledge that access would need to be appropriately managed within the framework of participant obligations, but as a suggestion, retailer access could be enabled via an expansion to the NMI Discovery process, and we would be supportive of any proposals or rule change to enable this change. We also note that retailers will be included in the DER information provision processes under the consumer data right (CDR) changes and would suggest this is a precedent that could be expanded	AEMO notes the respondent's support for Option 3 and potential for CDR expansion.

9. Do you agree that the creation of a new NCC to identify Standalone EV Charging Stations would add value to the market? If no, please specify your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	9	CitiPower Powercor	No. CitiPower Powercor strongly recommends more analysis be undertaken to determine the business case for these changes and whether they will add value to the market. CitiPower Powercor does not see an immediate need for the introduction of these changes and recommends they be implemented as part of the broarder NEM 2025 changes.	AEMO notes that the respondent does not support the creation of a new NCC for standalone EV charging stations and that changes should align with NEM 2025.
2	9	United Energy	No. United Energy strongly recommends more analysis be undertaken to determine the business case for these changes and whether they will add value to the market. United Energy does not see an immediate need for the introduction of these changes and recommends they be implemented as part of the broarder NEM 2025 changes.	AEMO notes that the respondent does not support the creation of a new NCC for standalone EV charging stations and that changes should align with NEM 2025.
3	9	Intellihub	In principle we have no objections with the intent, however we disagree with this proposed new NCC. Firstly, the basis of this new value is that it would be '… a major step towards addressing some of the issues identified in the ESB's EV Standing Data consultation paper'. However, the ESB is suggesting to capture more detailed information, similar to the existing DER Register. We suggest AEMO considers the ESB's proposal and timeline to avoid duplication. We believe the better option is to take advantage of the ESB's proposal. Secondly, if AEMO believes that there is value in maintaining such a value in MSATS then similar to our above comment, we suggest having two	AEMO notes that the respondent does not support the introduction of EVCHARGE and its view that two separate fields should be used (load and generation) if it is introduced.

No.	Question	Stakeholder	Issue	AEMO response
			separate fields, one focused on load and the other focused on generation and defining EVCHARGE as one of the allowable values for the generation field. If AEMO proceed with the proposed change as is then the allowable values should be EVSMALL and EVLARGE (where these would align with the definition of SMALL and LARGE respectively) to capture the load information for the NMI so that the market participant's and the customer's rights and obligations are clear.	
4	9	AGL	AGL supports this change, as EV charging stations by their very nature, are likely to be highly unpredictable in terms of both load and export characteristics. Given the likely bidirectional and dynamic nature of these connection points AGL believes that this additional NMI classification will significantly benefit the networks, the market and financial participants. As such, they need to be easily identified so they can be managed outside normal forecasting processes.	AEMO notes the respondent's support for introducing EVCHARGE.
5	9	Origin	There is value but we would need to give a classification of the min load required to be recorded. We would suggest this new code only applies to DC chargers, or a standalone charger rated greater than 32A AC or multiple chargers combined rating behind the same meter > 32A. Not clear on the benefit of this NCC vs other behind the meter consumptions eg pools, heat pumps or indeed other devices like batteries.	AEMO notes that the respondent considers a minimum load should be recorded if EVCHARGE is introduced and its view that the benefit beyond other types of consumption is unclear.
6	9	Telstra Energy	As a proponent of a new NCC to identify standalone EV Charging stations, Telstra Energy recognise this new NCC will assist in identifying these connection points with significantly different usage characteristics. Due to the imminent rollout of a significant number of EV charging stations, Telstra Energy suggest this new NCC should be implemented without delay.	AEMO notes the respondent's support for EVCHARGE.
7	9	Jemena	No. As above in feedback to question 7.	AEMO notes that the respondent does not support the proposal
8	9	Vector Metering	No. The driver to classify public EV charging stations differently to any other loads, is unclear and the issue paper doesn't provide any insight. We are not aware of any regulation that says EV charging stations have different requirements to any other Business, Small or Large connection. As mentioned above, changing the NCC related to 'Small' and 'Large' customers will have high impact on participant systems and processes and will be costly to implement. Under the obligations of the NER/NERR/NERL EV's will treated the same as any other connection. i.e. If Load is small enough then NER/NERR 'Small Customer' provisions will apply,	AEMO notes that the respondent does not support the proposal and its alternative suggestion of changing the Customer Classification Code.

No.	Question	Stakeholder	Issue	AEMO response
			otherwise obligations related to 'Large' customers will apply. If EV Charging sites need to be treated differently to other customers, then an alternative to changing the NMI Classification Code is to change the Customer Classification Code i.e. Add a new code of EVCHARGE to CCC, so that CCC will contain 'Business', 'Residential' and 'EVCHARGE'. Retailers can then use this in their processes.	
9	9	Alinta	Alinta does not agree. It is unclear what the driver is to classify public EV charging stations differently to any other loads and the issue paper does not provide any insight. We are not aware of any regulation that says EV charging stations have different requirements to any other Business, Small or Large, connection. As mentioned above changing the NCC is extremely invasive to participant systems and processes and if there is a requirement to do so then this needs to be carefully considered. Under the obligations of the NER/NERR/NERL EV's will be treated the same as any other connection. i.e. If Load is small enough then NER/NERR 'Small Customer 'provisions will apply.	AEMO notes that the respondent does not support the introduction of EVCHARGE and the impacts for participant systems.
10	9	Red Energy and Lumo Energy	Red and Lumo do not agree that the creation of an EVCHARGE NCC will add value to the market. EVCHARGE as a descriptor does not consider other sites with significant demand or generation profiles which are not specific to electric vehicles, making this description unnecessarily limited and potentially ineffective. The proposal fails to consider the potential for growth of sites or devices with similar consumption, demand or 'sent out' (generation) capability and the potential for ambiguity about which NCC a site should be considered under, NREG, SMALL or LARGE, depending upon the size and use of the site. The use of this term for a standalone station will also segregate them and fail to address visibility of similar sites which may have adjacent load or generation.	AEMO notes that the respondent does not support the introduction of EVCHARGE
11	9	AusNet	AusNet does not support to the creation of a new NCC to identify Standalone EV Charging Stations. There is no amending Rule that requires different treatment for Standalone EV Charging Stations. There may be in the future as the ESB consultation paper progresses to a Rule change proposal. Expectation of future Rule requirements is not justification for a procedure change and runs the risk of making changes that conflict with any future amending Rule on Standalone EV Charging Stations, and hence resulting in higher costs to implement than prudent or necessary. Additionally, the characteristics of EV Charging are similar to any other commercial and industrial customer. They can be small with a single intermittently used to very large with more than a dozen charges. The amount of work required to make system and process changes associated with this new NCC would not be beneficial or justified, at least, not until there is an amending Rule.	AEMO notes that the respondent does not support the introduction of EVCHARGE as there is no amending rule that requires different treatment of standalone EV chargers.

No.	Question	Stakeholder	Issue	AEMO response
12	9	PLUS ES	PLUS ES does not support creating a new NCC to identify a standalone EV charging station: ○ The DER register would be the optimal DBoR to capture this information (as noted in PLUS ES response to Question 8); including the EV attributes proposed in the ESB EV issues paper. ○ It is not understood why there is a requirement to treat these NMIs differently and not enough detail was provided to qualify the request. These NMIs will be consuming load and eventually could also generate back into the grid etc. They can still be classified as SMALL, LARGE etc, data will still be required to be collected and the customer invoiced etc. If anything, we would have assumed that identifying EV charging stations irrespective if they are standalone would be more valuable.	AEMO notes that the respondent does not support the introduction of EVCHARGE and its view that the DER Register is the appropriate place for this information.
13	9	SA Power Networks	No – please see comments within Q7 response.	AEMO notes the respondent's comment
14	9	Energy Queensland	Energy Queensland acknowledges and supports the desire to identify unique connections such as Standalone EV Charging Stations. However, we do not support unique identifiers for connections for non-stand-alone EV chargers installed behind a customers' metering installation. We also note that the proposed change to introduce EVCHARGE has the potential to require further change in time	AEMO notes that the respondent does not support the introduction of EVCHARGE

10. Do you agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS? If not, please specify your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	10	CitiPower Powercor	CitiPower Powercor supports the proposed minor editorial change.	AEMO notes the respondent's support for the proposed change
2	10	United Energy	United Energy supports the proposed minor editorial change.	AEMO notes the respondent's support for the proposed change
3	10	Intellihub	We support the minor editorial changes to ensure clarity of the Customer Threshold Codes (CTC) in CATS by specifying the jurisdictional limits related to the CTC of LOW, MEDIUM and HIGH. For transparency and easy reference, we suggest that the name of the jurisdictional legal instrument be included as a footnote. We do not support the proposed changes to remove references to 'Residential' and 'Business' in the definition of SMALL and LARGE. When references to 'Residential' and 'Business' was included in the definition of SMALL and LARGE, AEMO stated (page 8 of final determination from https://aemo.com.au/consultations/current-and-closed-consultations/metering-icf-package): *The proposed changes would enable Metering Coordinators (MCs) to use the correct threshold,*	AEMO notes the respondent's support for the minor editorial changes and its view that the name of the jurisdictional legal instrument be included as a footnote. AEMO notes that the respondent does not agree with removal of references to 'Residential' and 'Business' in the definition of SMALL and LARGE.

No.	Question	Stakeholder	Issue	AEMO response
			when initiating change requests to appoint themselves as new MCs. Incorrectly, MCs had been using change code requests 6300 and 6301, where the NMI classification code was SMALL. AEMO guided MCs to use Table 4-D, to define the Average Daily Load (ADL) thresholds of Small and Large customers. The issues paper now suggest that the Customer Classification Code (CCC) should be used to determine if the NMI is a residential or business customer. However, the issues paper does not explain in detail what is the current issue or what has changed since AEMO included the references to 'Residential' and 'Business' in the definition of SMALL and LARGE. Also, it is not clear whether this proposed change will reverse the intent of the ICF_031 (the ICF raised that resulted in references to 'Residential' and 'Business' added to the definition of SMALL and LARGE) and therefore re-introduce the issue ICF_031 was trying to resolve. We believe more analysis is required before removing references to 'Residential' and 'Business' in the definition of SMALL and LARGE.	
4	10	AGL	AGL proposed these minor editorial amendments to ensure consistent understanding and application across the NEM, and therefore supports these changes.	AEMO notes the respondent's support for the proposed change
5	10	Origin	No Issue	AEMO notes the respondent's support for the proposed change
6	10	Telstra Energy	Telstra Energy agree with the proposed minor editorial changes to ensure clarity of the Customer Threshold Limits in CATS.	AEMO notes the respondent's support for the proposed change
7	10	Ausgrid	Ausgrid would like to see further information (i.e marked up version of the relevant CATS table) on the proposed changes associated with this before we would support the changes.	AEMO notes that the respondent requires further information on the proposed changes.
8	10	Jemena	Agreed.	AEMO notes the respondent's support for the proposed change
9	10	Vector Metering	No. We do not support the change to Table 4-D – NMI Classification Codes. The issue of jurisdictional thresholds was dealt with under ICF-031/CIP-031 in 2020 which updated the table to correctly reflect the designation of NMI classification codes and the jurisdictional thresholds. The table currently reflects the correct jurisdictional thresholds.	AEMO notes that the respondent does not support the proposed changes.
10	10	Alinta	Agreed.	AEMO notes the respondent's support for the proposed changes.

No.	Question	Stakeholder	Issue	AEMO response
11	10	Red Energy and Lumo Energy	Red and Lumo support the reversion of the NCC Description to remove reference to Business or Residential customer, as introduced in MSATS PROCEDURES CATS PROCEDURE PRINCIPLES AND OBLIGATIONS v5.4 However, Red and Lumo strongly oppose the inclusion of the thresholds in the table of Customer Threshold Codes. The current definitions of Customer Consumption Thresholds as published are used as the basis of both regulatory obligations as well as numerous Government policy approaches. Most recently when the Federal Government has examined support for small business customers these have been defined as per the existing procedures and State regulations which align as appropriate. The proposed inclusion of the thresholds introduces a risk of conflict and confusion between regulatory instruments and the procedures. Further Red and Lumo are unconvinced of the benefit these changes to Threshold Limits will provide to justify this change.	AEMO notes the respondent's opposition to the inclusion of thresholds in the Customer Threshold Codes table.
12	10	AusNet	We note that jurisdictional differences are long standing, they can be complex and subtle in their effect on customer obligations. Given the market has operated for two decades already without referencing these jurisdictional differences, we do not understand the need to make this change now, particularly given the likely costs implications of the change. If this change were to be considered it should be supported by a written explanation on the differences in the jurisdictional laws. This level of detail was not provided, and neither was a cost benefit justification of the change. Therefore, we do not support the referencing of these jurisdiction codes.	AEMO notes that the respondent does not support the proposed changes.
13	10	PLUS ES	There is some ambiguity as to what editorial changes AEMO is referencing as this has not been clearly articulated/depicted in the issues paper. We are assuming to the below proposed presented in Feb's ERCF meeting pack:  PLUS ES does not object to this change, noting generally our preference is to avoid re-iterations of customer thresholds across multiple tables. This creates a larger administrative burden and has a risk that any future updates to jurisdictional thresholds get missed.	AEMO notes that the respondent requires further information on the proposed changes.
14	10	SA Power Networks	No – changes were made in 2020 and it is unclear what policy changes have occurred that require this to be revisited and impose further costs and rework for industry.	AEMO notes that the respondent does not support the proposed changes.
15	10	Energy Queensland	Ergon Energy Retail supports the proposed change to deliver clarity to the Customer Threshold Code for jurisdictional thresholds. However, we disagree with NMI classification based on the customer classification and support	AEMO notes that the respondent supports clarity on the Customer Threshold Code for jurisdictional thresholds. AEMO also notes the

No.	Question	Stakeholder	Issue	AEMO response
			reversal of the change implemented in November 2022 as discussed at the 23 February 2023 meeting of AEMO's Electricity Retail Consultative Forum.	respondent's comments on the change implemented in November 2022.

11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.

No.	Question	Stakeholder	Issue	AEMO response
1	11	CitiPower Powercor	CitiPower Powercor does not support the timing of these changes and strongly recommends they be delivered in line with the NEM 2025 changes. However, if these changes are to proceed, as they are not simple changes, CitiPower Powercor will be required to make complex system and process changes to support this and will require minimum 12 monthts to implement.	AEMO notes that the respondent does not support the timing of the proposed changes and that it should be aligned with NEM 2025.
2	11	United Energy	United Energy does not support the timing of these changes and strongly recommends they be delivered in line with the NEM 2025 changes. However, if these changes are to proceed, as they are not simple changes, United Energy will be required to make complex system and process changes to support this and will require minimum 12 monthts to implement.	AEMO notes that the respondent does not support the timing of the proposed changes and that it should be aligned with NEM 2025
3	11	Intellihub	We believe that these changes are not minor as it will have flow on impacts to our systems and processes. We suggest a go live date that aligns with the IESS is appropriate, that is 2 June 2024, assuming AEMO's proposed rule change called 'Implementing integrated energy storage systems' gets approved, otherwise 3 June 2024.	AEMO notes the respondent's preference for an implementation date of 2 June 2024 in alignment with IESS changes.
4	11	AGL	AGL proposes that the amended classifications should go live when the IESS Classifications go live, as this is the most efficient and lowest cost outcome for both AEMO and industry.	AEMO notes the respondent's preference to align implementation timing with IESS changes.
5	11	Origin	Grouping of related changes and holding to a regular schedule of implementation help participants greatly.	AEMO notes the respondents comment.
6	11	Telstra Energy	Telstra Energy encourage AEMO to adopt a change date which is achievable by the industry whilst promptly addressing current issues. Given that the IESS NCC changes are proposed to be undertaken in May 2023, there is logic in including all similar changes in the same release. However, it maybe appropriate for AEMO to consider some sort of compliance holiday to mimimuse unnecessary industry burden.	AEMO notes the respondents preference to align the implementation of changes with other similar changes.
7	11	Ausgrid	Considering that above comments, where additional analysis is required, these dates may need to be pushed out.	AEMO notes the respondent's comment.

No.	Question	Stakeholder	Issue	AEMO response
8	11	Jemena	Please see feedback to question 7.	AEMO notes the respondent's comment.
9	11	Vector Metering	AEMO must consider the impact of the industry agreed solution on participants systems and processes. Should the consultation decide that the proposed solution described in ICF-059 be adopted then all participants will need adequate time to review all their processes and systems and make the necessary adjustments. As already indicated, the proposed change has high impact on participant systems and therefore will require a large amount of effort to identify and change all areas that are impacted.	AEMO notes the respondent's comments.
10	11	Alinta	AEMO must consider the impact of the industry agreed solution on participants systems and processes. Should the consultation decide that the proposed solution described in ICF-059 should be adopted then all participants will need adequate time to review all their processes and systems and make the necessary adjustments. As already indicated, the proposed change is highly invasive on participant systems and therefore will require a large amount of effort to identify all areas that are. Subsequent use of "Small" and "Large" terminology throughout all market procedures will also need to be reviewed for clarity, especially to prevent confusion around treatment of residential customers who are Small Customers under the retail regulatory requirements, but their NMI Classification Code is proposed to be changed to Large due to their consumption exceeding consumption thresholds traditionally only applicable to business customers.	AEMO notes the respondent's comments.
11	11	PLUS ES	PLUS ES recommends that the effective date should be commensurate to the impact of the change on participants systems, as well as other deliverable initiatives. That is, for the: o Building Name field Length – the effective date could be effective on the next schema change which will allow participants to make the system change as it is considered a minor change. o Proposed ICF 059 NCC – these changes are significant and if AEMO determines to proceed, should allow a sufficient time for the participants to undertake the analysis and implement the solution. i.e. >12 months from publication of final procedures. o CCT editorial changes – If they are editorial only, one can assume that there is no impact. The effective date could align with the next effective date of the CATS procedure.	AEMO notes the respondent's views on ensuring the timing is commensurate with the impact on participant systems.
12	11	SA Power Networks	SA Power Networks do not support this change, however, if this was to proceed, a minimum of 12 months follow the publishing of the final determination would be required.	AEMO notes the respondent's comments.

5.3. Procedure Drafting Changes

5.3.1. Retail electricity market procedures – Glossary and Framework

No.	Section	Stakeholder	Issue	AEMO response
1	Figure 1	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	Figure 1	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	Figure 1	Origin	No issues	AEMO notes the respondent's support for the change
4	Figure 1	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	Figure 1	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	Figure 1	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
7	Figure 1	SA Power Networks	No comment.	
No.	**Section**	**Stakeholder**	**Issue**	**AEMO response**
1	2.6.2	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	2.6.2	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	2.6.2	Origin	No issues	AEMO notes the respondent's support for the change
4	2.6.2	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	2.6.2	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	2.6.2	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	2.6.2	PLUS ES	PLUS ES supports in concept the description but cannot make specific	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft

No.	Section	Stakeholder	Issue	AEMO response
			comment as the draft procedures have not been provided.	procedure mark-ups have been provided as part of this draft consultation
8	2.6.2	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	4.1.2	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	4.1.2	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	4.1.2	Origin	No issues	AEMO notes the respondent's support for the change
4	4.1.2	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	4.1.2	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	4.1.2	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	4.1.2	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	4.1.2	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	Glossary	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	Glossary	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	Glossary	Origin	No issues	AEMO notes the respondent's support for the change
4	Glossary	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation

No.	Section	Stakeholder	Issue	AEMO response
5	Glossary	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	Glossary	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	Glossary	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	Glossary	SA Power Networks	No comment.	

5.3.2. MSATS CATS

No.	Section	Stakeholder	Issue	AEMO response
1	2.2 Financially responsible market participant	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	2.2 Financially responsible market participant	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	2.2 Financially responsible market participant	Origin	No issues	AEMO notes the respondent's support for the change
4	2.2 Financially responsible market participant	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	2.2 Financially responsible market participant	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	2.2 Financially responsible market participant	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	2.2 Financially responsible market participant	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation

No.	Section	Stakeholder	Issue	AEMO response
8	2.2 Financially responsible market participant	SA Power Networks	No comment.	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
1	2.9 Demand Response Service Provider	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	2.9 Demand Response Service Provider	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	2.9 Demand Response Service Provider	Origin	No issues	AEMO notes the respondent's support for the change
4	2.9 Demand Response Service Provider	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	2.9 Demand Response Service Provider	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	2.9 Demand Response Service Provider	AusNet	AusNet agrees this change is consistent with the amending IESS Rule	AEMO notes the respondent's support for the change
7	2.9 Demand Response Service Provider	PLUS ES	See comment in Question 2. PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	2.9 Demand Response Service Provider	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	Table 4-A-Change Reason Codes	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	Table 4-A-Change Reason Codes	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	Table 4-A-Change Reason Codes	Origin	No issues	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
4	Table 4-A-Change Reason Codes	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	Table 4-A-Change Reason Codes	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	Table 4-A-Change Reason Codes	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	Table 4-A-Change Reason Codes	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	Table 4-A-Change Reason Codes	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	4.5 NMI Classification	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	4.5 NMI Classification	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	4.5 NMI Classification	Origin	No issues	AEMO notes the respondent's support for the change
4	4.5 NMI Classification	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	4.5 NMI Classification	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	4.5 NMI Classification	AusNet	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.	AEMO notes the respondents comment and refers to section 4.2 of this paper
7	4.5 NMI Classification	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation

No.	Section	Stakeholder	Issue	AEMO response
8	4.5 NMI Classification	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	Table 4-H-Datastream Status Codes	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	Table 4-H-Datastream Status Codes	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	Table 4-H-Datastream Status Codes	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
4	Table 4-H-Datastream Status Codes	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
5	Table 4-H-Datastream Status Codes	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
6	Table 4-H-Datastream Status Codes	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
7	Table 4-H-Datastream Status Codes	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	6.2 Error Corrections	AGL	AGL notes this comment and seeks clarity given the issue raised earlier in the response.	AEMO notes the respondent's support for the change
2	6.2 Error Corrections	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	6.2 Error Corrections	Origin	No issues	AEMO notes the respondent's support for the change
4	6.2 Error Corrections	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation

No.	Section	Stakeholder	Issue	AEMO response
5	6.2 Error Corrections	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	6.2 Error Corrections	AusNet	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.	AEMO notes the respondents comment and refers to section 4.2 of this paper
7	6.2 Error Corrections	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	6.2 Error Corrections	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	15.2.3 Requesting Participant Requirements	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	15.2.3 Requesting Participant Requirements	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	15.2.3 Requesting Participant Requirements	Origin	No issues	AEMO notes the respondent's support for the change
4	15.2.3 Requesting Participant Requirements	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	15.2.3 Requesting Participant Requirements	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	15.2.3 Requesting Participant Requirements	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	15.2.3 Requesting Participant Requirements	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been

No.	Section	Stakeholder	Issue	AEMO response
				provided as part of this draft consultation
8	15.2.3 Requesting Participant Requirements	SA Power Networks	No comment.	

5.3.3. MSATS WIGS

Each participant gave an identical response to all changes proposed in the 'Change Request Type' table. One response from each participant is included for brevity.

No.	Section	Stakeholder	Issue	AEMO response
1	All sections in 'Change Request Type' table	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	All sections in 'Change Request Type' table	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	All sections in 'Change Request Type' table	Origin	No issues	AEMO notes the respondent's support for the change
4	All sections in 'Change Request Type' table	AusNet	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.	AEMO notes the respondents comment and refers to section 4.2 of this paper
5	All sections in 'Change Request Type' table	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	9.2.3	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	9.2.3	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	9.2.3	Origin	No issues	AEMO notes the respondent's support for the change
4	9.2.3	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation

No.	Section	Stakeholder	Issue	AEMO response
5	9.2.3	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	9.2.3	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	9.2.3	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	9.2.3	SA Power Networks	No comment.	

5.3.4. Metrology Procedure Part A

No.	Section	Stakeholder	Issue	AEMO response
1	3.4	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	3.4	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	3.4	Origin	No issues	AEMO notes the respondent's support for the change
4	3.4	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	3.4	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	3.4	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	3.4	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	3.4	SA Power Networks	No comment.	

5.3.5. Metrology Procedure Part B

No.	Section	Stakeholder	Issue	AEMO response
1	10.3	AGL	AGL supports this change	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
2	10.3	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	10.3	Origin	No issues	AEMO notes the respondent's support for the change
4	10.3	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	10.3	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	10.3	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
7	10.3	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
1	12.3	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	12.3	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	12.3	Origin	No issues	AEMO notes the respondent's support for the change
4	12.3	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	12.3	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	12.3	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	12.3	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	12.3	SA Power Networks	No comment.	

No.	Section	Stakeholder	Issue	AEMO response
No.	Section	Stakeholder	Issue	AEMO response
1	13.1	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	13.1	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	13.1	Origin	No issues	AEMO notes the respondent's support for the change
4	13.1	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	13.1	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	13.1	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	13.1	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	13.1	SA Power Networks	No comment.	
No.	Section	Stakeholder	Issue	AEMO response
1	13.5	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	13.5	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	13.5	Origin	No issues	AEMO notes the respondent's support for the change
4	13.5	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	13.5	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	13.5	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
7	13.5	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	13.5	SA Power Networks	No comment.	

5.3.6. Standing Data for MSATS

No.	Section	Stakeholder	Issue	AEMO response
1	3.2	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	3.2	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	3.2	Origin	No issues	AEMO notes the respondent's support for the change
4	3.2	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	3.2	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	3.2	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	3.2	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	3.2	SA Power Networks	No comment.	

5.3.7. MSATS MDM Procedures

No.	Section	Stakeholder	Issue	AEMO response
1	3.2.3	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	3.2.3	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	3.2.3	Origin	No issues	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
4	3.2.3	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	3.2.3	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	3.2.3	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	3.2.3	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	3.2.3	SA Power Networks	No comment.	

5.3.8. Exemption Procedure Data Storage Requirements

No.	Section	Stakeholder	Issue	AEMO response
1	2.1	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	2.1	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	2.1	Origin	No issues	AEMO notes the respondent's support for the change
4	2.1	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	2.1	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	2.1	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	2.1	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	2.1	SA Power Networks	No comment.	

5.3.9. Guide to the Role of the Metering Coordinator

No.	Section	Stakeholder	Issue	AEMO response
1	4.1	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	4.1	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	4.1	Origin	No issues	AEMO notes the respondent's support for the change
4	4.1	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	4.1	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	4.1	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change
7	4.1	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	4.1	SA Power Networks	No comment.	

5.3.10. Service Level Procedure: Embedded Network Manager

No.	Section	Stakeholder	Issue	AEMO response
1	4.2.4	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	4.2.4	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	4.2.4	Origin	No issues	AEMO notes the respondent's support for the change
4	4.2.4	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	4.2.4	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	4.2.4	AusNet	AusNet does not agree with this change, for the reasons discussed earlier in this submission.	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
7	4.2.4	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	4.2.4	SA Power Networks	No comment.	

5.3.11. Service Level Procedure: MDP Services

No.	Section	Stakeholder	Issue	AEMO response
1	3.13	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	3.13	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	3.13	Origin	No issues	AEMO notes the respondent's support for the change
4	3.13	Vector Metering	Agree in principle but as the draft procedure has not yet been provided it is difficult to assess how proposed changes impact this section.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	3.13	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	3.13	AusNet	AusNet agrees this change is consistent with the amending IESS Rule, except the inclusion of DGENRATR and amendments to GENERATR for reasons discussed above.	
7	3.13	PLUS ES	PLUS ES supports in concept the description but cannot make specific comment as the draft procedures have not been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	3.13	SA Power Networks	No comment.	

5.3.12. MSATS Procedures: National Metering Identifier

No.	Section	Stakeholder	Issue	AEMO response
1	Appendix E	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	Appendix E	Jemena	No concerns.	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
			Will the table be updated with a newer version or remain deleted?	The draft procedure removes the existing tables and introduces new diagrams to illustrate potential combinations of loads/generating systems/BDUs and describe the relevant NMI classification code of each combination
3	Appendix E	Origin	No issues	AEMO notes the respondent's support for the change
4	Appendix E	Vector Metering	Unclear what is being proposed as the draft procedure has not yet been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	Appendix E	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	Appendix E	PLUS ES	PLUS ES cannot make specific comment as the draft procedures have not been provided and the proposal is a little ambiguous.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
7	Appendix E	SA Power Networks	No comment.	

5.3.13. Metering Data Provision Procedures

No.	Section	Stakeholder	Issue	AEMO response
1	4.3	AGL	AGL supports this change	AEMO notes the respondent's support for the change
2	4.3	Jemena	No concerns.	AEMO notes the respondent's support for the change
3	4.3	Origin	No issues	AEMO notes the respondent's support for the change
4	4.3	Vector Metering	Unclear what is being proposed as the draft procedure has not yet been provided.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
5	4.3	Alinta Energy	Agreed in concept	AEMO notes the respondent's support for the change
6	4.3	AusNet	AusNet agrees this change is consistent with the amending IESS Rule.	AEMO notes the respondent's support for the change

No.	Section	Stakeholder	Issue	AEMO response
7	4.3	PLUS ES	PLUS ES cannot make specific comment as the draft procedures have not been provided and the proposal is a little ambiguous.	AEMO notes the respondent's requirement for draft mark-ups to assess the impact; draft procedure mark-ups have been provided as part of this draft consultation
8	4.3	SA Power Networks	No comment.	