

Integrating Energy Storage Systems (IESS)

PROCEDURE CONSULTATION

PARTICIPANT RESPONSE TEMPLATE

Participant: Intellihub

Submission Date: 10 July 2023

1. Context

This template is to assist stakeholders in responding to the questions detailed in the Draft Report associated with the *Integrating Energy Storage Systems in the NEM Rule* (IESS Rule) consultation.

2. Consultation questions

Question	Participant Comments
<p>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.</p>	
<p>2. Are there any gaps in AEMO’s Procedure changes for the IESS Rule?</p>	
<p>3. Do you agree with the proposed approach to ICF_070 (Increase ‘Building Name’ field length in MSATS)?</p>	<p>We are supportive of the outcome ICF_070 is trying to achieve.</p> <p>We note that the draft determination proposes to achieve this outcome by updating the Standing Data for MSATS document so that the BuildingOrPropertyName field changes from two 30-character fields to a single 60-character field. We believe this proposed approach is sub-optimal because it will require a schema change and will introduce a misalignment with the B2B schema and Standards Australia AS4590.</p> <p>We suggest an alternative option is to update MSATS so that it has two 30-character fields. This alternative option will align MSATS with the existing Standing Data for MSATS document and the existing B2M schema therefore will have a lesser impact to participants than the proposal in the draft determination. This alternative option also ensures alignment with the B2B schema and Standards Australia AS4590 thus ensuring</p>

	<p>a consistent approach with B2B and better compatibility with other industries/organisations that comply with AS4590.</p> <p>For context, currently the building name field is defined to be two 30-character fields in the Standing Data for MSATS document, B2B Procedure Technical Delivery Specification, NEM ROLR Process Part A and Part B, aseXML for B2M and B2B and Standards Australia AS4590.</p> <p>Should AEMO decide on an approach that requires a schema change then we suggest that this change be bundled with other changes that requires a schema change to maximise the cost/benefit of the schema change.</p>
<p>4. Do you agree with AEMO’s decision to shift the substantive components of ICF_059 to a separate consultation process separate from the IESS consultation?</p>	
<p>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?</p>	
<p>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)?</p>	