

# Integrated Energy Storage Systems

## PROCEDURE CONSULTATION

## PARTICIPANT RESPONSE TEMPLATE

*Participant: United Energy*

*Submission Date: 3 April 2023*

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## 1. Context

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

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

## 2. Consultation questions

### *NMI Classification Code amendments*

Question	Participant Comments
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.	Yes. United Energy supports the proposed changes
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?	
3. What is the likely impact of the proposed changes for participant systems and processes? Do participants require any further information from	United Energy is required to add new NMI Classification Codes into our system and uplift processes to support

AEMO to understand the impact of the proposed changes?	
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***Amendments to terminology***

<b>Question</b>	<b>Participant Comments</b>
4. Are there any gaps or issues with AEMO's assessment of the impacts of terminology changes for procedures?	
5. Can participants provide comments on the need for a formal readiness program to be put in place for the implementation of IESS changes?	

***Other matters - ICF\_070 Increase 'Building Name' Field Length in MSATS***

<b>Question</b>	<b>Participant Comments</b>
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.	Yes. United Energy supports the proposed change

***Other matters - ICF\_059 CATS clarifications plus NMI Classification Review***

<b>Question</b>	<b>Participant Comments</b>

<p>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.</p>	<p>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.</p>
<p>8. Do you believe a different, or alternative, Option may better achieve this objective? If yes, please provide your preferred solution and your reasoning.</p>	<p>United Energy's strong recommendation is that these changes be considered as part of the broader NEM 2025 changes.</p>
<p>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.</p>	<p>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 broader NEM 2025 changes.</p>
<p>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.</p>	<p>United Energy supports the proposed minor editorial change.</p>
<p>11. What do you believe AEMO should consider in determining the proposed effective date/implementation date of the proposed changes? Please specify your reasoning.</p>	<p>United Energy does not support the timing of these changes and strongly recommends they be delivered in line with the NEM 2025 changes.</p> <p>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 months to implement.</p>

### 3. Procedure Drafting Changes

#### *Retail electricity market procedures – Glossary and Framework*

Section	Description	Participant Comments
Figure 1	Modify diagram to represent bi-directional flows of energy instead of uni-directional flows	
2.6.2	Include <i>integrated resource systems</i> as a term that is included in the WIGS Procedures	
4.1.2	Remove <i>market loads</i> and replace with <i>market connection points</i>	
Glossary	<p>Remove the following terms:</p> <ul style="list-style-type: none"> <li>• First Tier NMI</li> <li>• First Tier Load</li> <li>• Second Tier NMI</li> <li>• Second Tier Load</li> <li>• Tier 1 Site</li> <li>• Tier 2 Site</li> </ul> <p>Include the following term:</p> <ul style="list-style-type: none"> <li>• Financially Responsible</li> </ul> <p>Add <i>Integrated Resource Provider</i> to the definition of FRMP</p>	

**MSATS CATS**

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
<p>2.2 Financially responsible market participant</p>	<p>Part (d)</p> <p>Delete 'Ensure that only small generating unit connection points are assigned to the relevant MSGA' and replace with 'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'</p> <p>Delete sections (i) and (j) and replace with:</p> <p>'Ensure that only small resource connection points are assigned to the relevant Small Resource Aggregator'</p>	
<p>2.9 Demand Response Service Provider</p>	<p>Include NREG as an NMI Classification that a DRSP can be assigned to.</p>	
<p>Table 4-A-Change Reason Codes</p>	<p>Include TIRS and DGENERATR as part of Note (1)</p>	
<p>4.5 NMI Classification</p>	<p>Include the new classification codes for DGENRATR, TIRS and DIRS and modify the descriptions of GENERATR and NREG</p>	

Section	Description	Participant Comments
Table 4-H- Datastream Status Codes	Remove reference to second tier retailer  Part (d) If a retailer transfer CR is Completed the Datastream Status Code must be 'A' when the NMI is energised.	
6.2 Error Corrections	Footnote 8.  Include DIRS, TIRS and DGENRATR in reference to "not SMALL"	
15.2.3 Requesting Participant Requirements	Remove the following field as a selection option from the BCT:  The Tier Status (not required if both the LR and FRMP are provided as selection criteria)	

### **MSATS WIGS**

New NCCs are proposed to be included in the Condition Precedent component of the Wholesale, Interconnector, Generator and Sample (WIGS) procedure. The existing system constraints are unchanged for each participant requirement, timeframe and objection for each change request submitted.

Change Request type	Section	Conditions Precedent	Participant Comment
Change Retailer	2.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	
Error Applications	2.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG or DWHOLSAL	



Change Request type	Section	Conditions Precedent	Participant Comment
Provide Data – Change Request	3.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL, BULK or XBOUNDARY	
Create NMI – Change Requests	4.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
N – New Role, C – Current Role. Create Child NMI	4.2.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, DWHOLSAL OR WHOLESAL	
Create NMI, Metering Installation Details and NMI Datastream	4.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Create Metering Installation Details	5.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDARY, DWHOLSAL or SAMPLE	
Exchange of Metering Information	5.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change Metering Installation Details	5.4.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change Network Tariff Code	5.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Create and Maintain Datastream – Change Requests	6.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Exchange of Datastream Information	6.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change NMI Datastream	6.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Maintain NMI – Change Requests	7.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change a NMI	7.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	

Change Request type	Section	Conditions Precedent	Participant Comment
Change NMI Embedded Network (child)	7.3.2	The NMI Classification Code is WHOLESAL, NREG, DWHOLSAL, TIRS, DIRS, DGENRATR or GENERATR	
Change Parent Name	7.4.2	The NMI Classification Code is TIRS, DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change LNSP	8.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MDP	8.2.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MC	8.3.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, DWHOLSAL or SAMPLE	
Change ENLR – Child NMI	8.4.2	The NMI Classification Code is DIRS, DGENRATR, GENERATR, NREG, DWHOLSAL or WHOLESAL	
Change ROLR	8.5.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
Change MPB or MPC or Both	8.6.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	
AEMO Only Change Requests	9.1.2	The NMI Classification Code is WHOLESAL, INTERCON, TIRS, DIRS, DGENRATR, GENERATR, NREG, BULK, XBOUNDRY, DWHOLSAL or SAMPLE	

Section	Description	Participant Comments
9.2.3	<p>Remove the following field as a selection option from the BCT:</p> <p>The Tier Status (not required if both the LR and FRMP are provided as selection criteria)</p>	

***Metrology Procedure Part A***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
3.4	Remove reference to 'first tier load'	
3.5	Remove reference to 'first tier load'	
3.6	Remove reference to 'second-tier' and 'first-tier loads' from 3.6 (a)	
12.8.2	Remove reference to 'first tier controlled load' and 'second tier controlled load' and include market customer. In 12.8.2 Load Profiling (a) and remove first tier from 12.8.2 Load Profiling (b) and include market customer.	

***Metrology Procedure Part B***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
10.3	Bi-directional units may have multiple sources of generation and load behind the connection point. For sites that are scheduled units, AEMO provides SCADA data for generating units. Validation of metering data for connection points	

Section	Description	Participant Comments
	<p>where SCADA is made available includes NCCs of DGENRATR and Small Resource Aggregator.</p> <p>New clause to reference bi-directional units where validation should occur for SCADA data suffixes of E and B channel data.</p>	
12.3	<p>Include Integrated Resource Provider and Small Resource Aggregator in 12.3(a) and remove reference to MSGA.</p>	
13.1	<p>Change all references in section 13.1 from Market Load to Market Connection Point</p>	
13.5	<p>Change reference from 'market load' to <i>market connection point</i></p>	

**Standing Data for MSATS**

Section	Description	Participant Comments
3.2	<p>Include new NCCs and remove reference to 'Small Generation Aggregator'.</p>	

### ***MSATS MDM Procedures***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
3.2.3	Replace 'Embedded Generator' in 3.2.3 (a) with <i>distribution connected unit</i> .	

### ***Exemption Procedure Data Storage Requirements***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
2.1	Remove reference to <i>transmission connection point</i> and <i>distribution connection point</i> where the FRMP is a <i>Market Generator</i> or <i>Market Small Generation Aggregator</i> to reflect the Rule Change 7.8.2(b1).	

### ***Guide to the Role of the Metering Coordinator***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
4.1	Remove <i>small generating units</i> and <i>market generating units</i> and include <i>non-market bidirectional units</i> and <i>small resource connection point</i> .	

***Service Level Procedure: Embedded Network Manager***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
4.2.4	Include the new NMI classification of DGENERATR	

***Service Level Procedure: MDP Services***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
3.13	Include new NCCs of XBOUNDRY, BULK, DGENRATR, DIRS and TIRS for connection points required to provide 90% of complete actual metering data by 8am for the day(s) specified for prudential purposes.	

***MATS Procedures: National Metering Identifier***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
Appendix E	Removal of current illustrations and tables of Appendix E	

***Metering Data Provision Procedures***

<b>Section</b>	<b>Description</b>	<b>Participant Comments</b>
4.3	Include a new energy flow type that reflects the purpose of the rule change to include bidirectional energy flows for generation connection points.	