Integrating storage – options paper: stakeholder feedback template

The template below has been developed to assist stakeholders in providing their feedback on the questions posed in this paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

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Questions		Feedback
Chapter 1 – Registration and participation framework		
Question 1: Registration and classification (p. 17)		
1	Is introducing a new participant category, an Integrated Resource Provider (option 4), to better facilitate entry and participation of storage and hybrid facility, more preferable than modifying existing participant categories (option 3)? Are either option 3 or 4 more preferable to options 1 and 2?	We don't see any benefit for Option 4 - changing the new participant category to Integrated Resource Provider. Tilt Renewables' preference is for flexibility to either have the DUID at the connection point or at the individual asset and the proponent can choose. Proponents should not be required to adhere to any new rule changes for facilities that are operational prior to any rule change.
Question 2: Classifying MSGAs (p. 18)		
1	Do you agree that, if an Integrated Resource Provider category (option 4) is established, battery aggregators should use that category and MSGAs should not be allowed to classify storage units exempt from the requirements to	No comment.

Questions		Feedback
	register as a Generator? And in that case, should the current arrangements regarding the provision of market ancillary services by MSGAs be maintained?	
Question 3: Existing storage participants (p. 19)		
1	Should existing storage participants be transitioned to a single participant category (as they are currently registered as both a Market Generator and Market Customer)?	Existing storage participants should be able to remain as both a Market Generator and Market Customer as per their registration and have the flexibility to transition to a single participant category only if they want to.
Question 4: Scheduling of hybrid facilities (p. 20)		
1	What proportion of a hybrid facility's sent-out generation capacity would need to be dispatchable for the whole of the hybrid facility's sent-out generation to be able to follow dispatch instructions, under a single DUID?	This is complex and would require further analysis and testing in the market before being implemented in any updated rule change. It will be necessary to understand the technical and commercial considerations. Due to the complexity of this modelling – it will not be achieved by a single developer in a short-timeframe and will need to be developed by a wider stakeholder group.
2	Would a dynamic approach to scheduling obligations, for example shifting between scheduled and semi-scheduled obligations based on the state of charge of the storage unit, be appropriate, and how should this operate?	As above.
3	Could the same approach be taken to scheduling load where storage is added to a Market Customer's site, or should different considerations apply?	As above.
Question 5: Number of price bands (p. 21)		
1	Do you agree that 20 price bands would be appropriate for grid-scale batteries or would another number of bands be more appropriate?	Tilt Renewables preference is to keep a minimum 20 price bands currently available for grid-scale batteries for both charge and discharge.

Questions		Feedback
Question 6: Dispatching hybrid facilities (p. 21)		
1	Are there certain configurations of hybrid facilities that cannot, or should not, be dispatched at a single connection point?	There are commercial issues that arise due to offtake or other commercial structures being implemented that require multiple DUIDs. Tilt Renewables' needs the flexibility for multiple DUIDs at a hybrid facility.
2	What benefits are achieved by dispatching a hybrid facility at a single connection point, and what issues arise?	As above, it is important to be able to retain the flexibility to be able to separately dispatch each unit within a hybrid facility – commercial issues would arise by requiring hybrid facilities to shift to a single dispatch (e.g. interfering with bidding strategy). The ability to charge storage assets with co-located renewable energy without MLF impact or AEMO market fees would be beneficial – we would be interested in exploring options for charging BESS behind the meter that is not subject fees/impacts that does not require a single DUID at the connection point.
Question 7: Performance standards (p. 22)		
1	What issues may arise if performance and access standards are set at the connection point for hybrid facilities? Would these standards need to be amended to provide appropriate flexibility for hybrid facilities?	No issues identified from GPS / CPS perspective.
Chapter 3 – Recovery of non-energy costs		
Question 8: Options for the recovery of non-energy costs (p. 27)		
1	Which option do you consider to be the most appropriate for the recovery of non- energy costs from market participants? Please provide detail on why it would be the most appropriate option.	No comment.
2	Are there any other factors the Commission should consider when deciding how non-energy costs should be recovered from market participants?	No comment.

Questions		Feedback
3	Are there any implementation issues the Commission should consider?	No comment.
Chapter 4 – Additional issues relating to storage		
Question 9: Network service provider connection points (p. 34)		
1	Do you support the solution outlined in this options paper for resolving the potential issues with establishing standards for NSP owned energy storage?	No comment.
2	If not, do you consider there to be other potential solutions for resolving this issue?	No comment.
Question 10: DC coupled systems (p. 38)		
1	What capital, operational or efficiency benefits do DC-coupled systems provide participants and the NEM as a whole, and how might these benefits help consumers in line with the NEO?	No comment.
2	Do you support amending the NER to permit the registration and operation of DC-coupled systems? If so, how should they register and operate?	No comment.
Question 11: Provision of ancillary services (p. 40)		
1	Do you support AEMO's proposal to redraft ancillary services provisions in Chapter 2 of the NER to make it more consistent with the services approach to regulation currently being considered by the ESB's two-sided market work? Please explain why or why not.	No comment.