



**EnergyAustralia**

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## **ISSUES PAPER – DEMAND SIDE PARTICIPATION INFORMATION GUIDELINES**

EnergyAustralia is one of Australia's largest energy companies with over 2.5 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market.

Following the Australian Energy Market Commission's Rule change of 26 March 2015 'Improving demand side participation information provided to AEMO by registered participants'<sup>1</sup>, AEMO were obligated to create the guideline for information requests now under consultation. EnergyAustralia did not support the rule change as there was insufficient justification that additional data from retailers would be beneficial. We also noted that non-regulatory options were not assessed<sup>2</sup>. We considered that given the financial incentive for accurate forecasts placed on market participants, data that participants are not able to accurately use for their internal forecasts will be of little use to AEMO.

However, in light of the Rule change, we support AEMO's conclusion that raw data should be targeted over aggregated data. This ensures a consistent approach across surveyed participants and provides the best chance that the data will support a useful forecast. The targeting of NMIs ensures that forecasts of demand response will be largely independent of retailer churn or contract changes.

We suggest that annual, or even biennial, data requests are appropriate. Compliance with the data requests will require significant manual work; the cost of semi-annual data requests will be double that of an annual request. We do not consider that there will be enough variation in data sets across a year to justify this additional expense.

The guidelines should make it clear that registered participants are only obligated to provide data which they currently gather for other purposes, i.e. nothing in the guideline should require registered participants to make additional or ad hoc data requests to their customers. Data Model Section 2 covers a range of specific information much of which is not relevant to a retailer's operation and may not be requested from customers as a matter of course. The data

<sup>1</sup> <http://www.aemc.gov.au/Rule-Changes/Improving-Demand-Side-Participation-information-pr>

<sup>2</sup> <http://www.aemc.gov.au/getattachment/b78597cc-bf4c-4a06-92d5-6f26e8722797/Energy-Australia.aspx>

should also be limited to the fields that participants already capture in their systems or can be readily derived from this.

A clearer distinction between what is required from different types of registered participants would aid compliance. For example, in data model section 1 there are only four relevant fields for retailers: 'market exposed connections', 'connections on retail TOU tariffs', 'Future deployment', and 'alerts lists'. Errors and confusion may come from fields such as 'connections with energy storage' where each participant may have incomplete or disparate information on which of their customers may have on-site storage, so these should certainly not be seen as the primary information source.

We also question the benefit of forward looking information and suggest it not be included in the draft. Strategic programs can be both commercially sensitive and highly subjective. The principles proposed by AEMO in determining what DSP information to request as outlined in the issues paper are inconsistent with information of this nature. Providing this data would be problematic and provide no reliable information to aid AEMO's forecasts.

If you would like to discuss this submission, please contact me on (03) 8628 1393.

Regards

**Chris Streets**

Industry Regulation Lead