

08 March 2017

Karen Olesnicky
Acting Chief Executive Officer
Australian Energy Market Operator Ltd
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By e-mail: energy.forecasting@aemo.com.au

Demand Side Participation Information Guidelines – Draft Report & Determination

Dear Karen,

Energy Networks Australia welcomes the opportunity to make a submission to the Australian Energy Market Operator (AEMO's) Demand Side Participation Information Guidelines – Draft Report and Determination (February 2017).

Energy Networks Australia is the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

As stated previously, Energy Networks Australia recognises and supports AEMO's obligation under clause 3.7D of the National Electricity Rules to develop guidelines that require Registered Participants to collect and provide to AEMO appropriate high quality information that is used in developing, and then applied, in electricity load forecasts.

Energy Networks Australia would like to commend AEMO on the considered and practical approach it has taken in responding to submissions received on this matter.

Through consultation with its member businesses, Energy Networks Australia has identified several general comments for further consideration by AEMO.

Data collection requirements and implementation timeframe

Energy Networks Australia continues to support practical and reasonable information collection requirements, which are proportionate and clearly correlated to the intended final use of this information. It must again be emphasised that based on a clear understanding of these objectives, such information provision should help to ensure that costs borne by AEMO, network service providers (NSPs) and consumers alike are minimised.

Energy Networks Australia considers provision of required data in CSV format, via an AEMO-run web portal, an improvement in practicality over the previously suggested spreadsheet format. It is also recognised that allowing data to be provided in high-level groupings is an improvement.

We also welcome the initial limitation of data requested to that which is already collected. However, NSPs will still have to gather data from multiple sources in multiple formats and thereby be required to manually, or automatically process the data into the required format. This work should not be underestimated. Energy Networks Australia maintains that provision of the data should continue to meet a cost versus benefit test. We therefore encourage AEMO to undertake a review of the costs and benefits of data collection after 12 months operation and continue to monitor this over time.

Energy Networks Australia agrees with AEMO's draft determination that only requires NSPs to annually report the required information, including active demand management and load control programs on an 'historical timing' or 'single instance' basis.

Energy Networks Australia recognises the practical rollout implementation timeframe and annual frequency of submission of information, commencing in April 2018.

Linkages to related consultation processes

We appreciate that AEMO has considered the concerns expressed in Energy Networks Australia's previous submission on this matter regarding linkages to related consultation processes, and subsequently determined not to extend data collection requirements.

Energy Networks Australia would still like to offer to work with AEMO and other stakeholders to develop a wider strategy for addressing key issues in power system data management, communications and reporting as stated in AEMO's Draft Report.

Should you have any additional queries, please feel free to contact Heath Frewin, Energy Network Australia's Senior Program Manager – Asset Management on (02) 6272 1531 or hfrewin@energynetworks.com.au.

Yours sincerely,



John Bradley
Chief Executive Officer