

28 November 2023



Mr Daniel Westerman  
Chief Executive Officer  
Australian Energy Market Operator  
GPO Box 2008  
Melbourne VIC 3001

Email: [energy.forecasting@aemo.com.au](mailto:energy.forecasting@aemo.com.au)

Dear Mr Westerman,

**Demand Side Participation (DSP) Forecasting Methodology and DSP Information Guidelines Consultation**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to its *Demand Side Participation (DSP) Forecasting Methodology and DSP Information Guidelines Consultation*

This submission is provided by Energy Queensland, on behalf of its related entities, including:

- Distribution network service providers, Energex Limited and Ergon Energy Corporation Limited; and
- Retailer, Ergon Energy Queensland Pty Ltd (Ergon Energy Retail)

**Information Guidelines Draft Report**

Energy Queensland notes that AEMO's position in the *DSP information guidelines* is to separate DSP programs that increase demand from those that decrease demand, noting that some programs may allow both. To that extent, we welcome AEMO's proposal to offer information updates and a webinar to support the next submission window in April 2024.

We also acknowledge that AEMO have determined to keep the portal open all year. In light of this, we suggest conducting the webinar sessions early in 2024 to allow for a smooth transition to the new reporting requirements.

Energy Queensland agree with AEMO's conclusion that it may be difficult to provide the duration of the DSP response as it may vary with the time of day, season, and climatic conditions. Therefore, providing this information as optional rather than mandatory is

preferable. Additionally, we consider that it could be helpful if AEMO were to provide guidance of 'an upper and lower bound' range on the DSP hours annual forecast to provide some certainty.

#### **Draft Forecast Methodology**

The Draft *DSP Forecast Methodology* identifies that the Integrated System Plan (ISP), which uses the DSP forecast, may contain different assumptions for reliability studies as they are scenario specific. Energy Queensland believes it would be sensible to align the central estimate scenario under the ISP with the DSP. This alignment would ensure there is at least one scenario that refers back to the operational forecast. This would also improve the comparability of the Electricity Statement of Opportunities (ESOO) with the ISP as the data submitted to the DSP in April is used for the ESOO published that same year.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on 0429 394 855 or Tammara Scott on 0492 137 878.

Yours sincerely



Alena Christmas  
**Acting Manager Regulation**

Telephone: 0429 394 855

Email: [alena.christmas@energyq.com.au](mailto:alena.christmas@energyq.com.au)