



Part of Energy Queensland

29 September 2023

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

Email: energy.forecasting@aemo.com.au

Dear Mr Westerman,

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

Ergon Energy Corporation Limited (Ergon Energy Network) and Energex Limited (Energex), both distribution network service providers (DNSPs) operating in Queensland, welcome the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) in response to its *Demand Side Participation (DSP) Forecasting Methodology and DSP Information Guidelines Consultation*.

Ergon Energy and Energex provide the following feedback in regard to the DSP Forecasting Methodology. We have also provided feedback on the consultation questions for the DSP Information Guidelines in the attached document.

Ergon Energy and Energex agree with the proposal to group DSP into two categories being, market-driven responses and reliability event responses. The categorisation provides a useful distinction between the high-level drivers of DSP. Currently, our DSPs are directly managed and utilised for network management purposes. However, as we complement to our portfolio of DSP resources with network management services procured from the market, there will be a need to classify those in the appropriate category, such as, market driven response.

Ergon Energy and Energex consider that the inclusions and exclusions of the proposed DSP categorisations could be further defined. There is potential for the same resource to participate in more than one category and AEMO will need to ensure double counting does not occur. For example, the aggregated network support service provided from a group of batteries may appear in a network's DSP (under the reliability event classification) as well as in a retailer's DSP (under the market driven classification).

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



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Encl: Ergon Energy and Energex's comments on the Information Guidelines consultation questions

Consultation Question	Ergon Energy and Energex response
Potential changes to the DSP information collected:	
1. For which (if any) categories is it possible to meaningfully provide a duration of the potential or firm response?	The DSP response is estimated as a potential value because it may vary with the time of day, season, climatic conditions. The duration of the response also varies as the underlying potential energy pool size varies with the above factors. Accordingly, it is not possible to meaningfully provide a duration of the potential or firm response.
2. Would the possible DSP response duration differ between potential and firm DSP responses? If so, which of the two would it be the most meaningful to ask for?	Ergon Energy and Energex have no comment.
3. Would adding DSP response duration to the DSPI requirements be a suitable way for AEMO to collect this data?	Ergon Energy and Energex have no comment.
4. Noting that changes to DSP portfolios may not be known well in advance, is it meaningful to provide estimates of changes to existing DSP programs or information about new DSP programs?	We consider that providing information on potential future projects/programs is problematic as they may not eventuate and would therefore overestimate the potential future DSP.
5. Would it be possible to provide a level of confidence (in percentage or similar) in the data provided for future DSP programs? And would this ability to provide a confidence rating increase the likelihood of participants submitting data on future programs?	Ergon Energy and Energex have no comments.
6. Can the DSPI portal ask better questions about future DSP to elicit more responses from participants?	Ergon Energy and Energex have no comments.
7. Are there any emerging trends in DSP that would require AEMO to ask for additional data to enable a more accurate forecast DSP in its load forecasting processes?	Ergon Energy and Energex have no comments.
8. Is it likely that some DSP programs will be designed to both increase demand at times of low prices/system strength issues and also	Ergon Energy and Energex have no comments.

Consultation Question	Ergon Energy and Energex response
decrease demand when prices are high or network reliability is at risk?	
The DSPI collection process	
9. Is the current approach of collecting information through the DSPI portal during the month of April appropriate?	Yes. Both Ergon Energy and Energex have planning processes in place around these commitments and already work to these timeframes.
10. Is the current approach of collecting a statement of no DSP appropriate, or do stakeholders consider that alternative ways of providing this exist that do not rely on portal access? If so, what is that alternative(s)?	Ergon Energy and Energex have no comments.
11. What part of complying with the DSPI requirements takes up the most resources for participants? Is it the portal access, understanding how to use the portal, or particular upload files/data fields that makes this process resource-intensive?	It is our experience that gathering and verifying the required information is more resource intensive than the portal process. Notwithstanding, the portal process could be improved. Refer to our suggestions outlined in response to question 12.
Improving participants' understanding of DSPI process	
12. Can AEMO provide better documentation, such as an improved user guide, on-screen tips in the portal, or in its email reminders, on how to use the DSPI portal, in particular for typical tasks such as providing a statement of no DSP? Please provide specific suggestions	We suggest that AEMO could develop on-screen tips and guidance notes that explain common causes for errors in the portal and how to troubleshoot and resolve them. For example, ensuring that all NMIs have only 10 digits.
13. Can AEMO improve the explanation of when to use the various DSP categories in the reporting, through better documentation, webinars, or similar?	Ergon Energy and Energex have no comments.
14. Any review that leads to participants needing to update their submission should use the DSPI portal (if it is open) or use email communication methods (if the portal has closed). AEMO should accept emailed submissions in these circumstances. Is this a reasonable suggestion, or should this influence the considerations of the timing of DSPI portal availability (as per question 9)?	While the use of email submissions is a reasonable alternative, it is our preference that the portal remains open to allow participants to update their submission. The portal allows for a consistent format, data validation and avoids issues with file sizes and sharing of data via email.