

AMENDMENTS TO DEMAND SIDE PARTICIPATION INFORMATION GUIDELINES

ISSUES PAPER

Published: August 2020



Australian Energy Market Operator Ltd ABN 94072010327

www.aemo.com.au info@aemo.com.au

NEW SOUTH WALES QUEENSLAND SOUTH AUSTRALIA VICTORIA AUSTRALIAN CAPITAL TERRITORY TASMANIA WESTERN AUSTRALIA



EXECUTIVE SUMMARY

The publication of this Issues Paper commences the first stage of the consultation conducted by AEMO on proposed amendments to the Demand Side Participation Information (DSPI) guidelines (the Guidelines) using the rules consultation procedures as defined in the National Electricity Rules (NER).

Note that a separate DSP forecasting methodology consultation has occurred regarding the DSP forecasting methodology¹. This Issues Paper seeks input from the industry on changes to how AEMO collects information to support the DSP forecast, in particular, the DSPI Portal, and the practical considerations for data collection from market participants.

Topics included in this Issues Paper are:

- Updates to the data AEMO requires from participants to perform DSP forecasting.
- DSP's relationship with the Distributed Energy Resources (DER) Register and Wholesale Demand Response (WDR) interface.
- How the DSP programs should be classified to support the evolution of DSP.
- Entry of industry participant contact information to expedite AEMO's clarification of information entered in the portal.

Carefully considered changes or additions to terminology are also included, to ensure consistency and clarity.

This document details the impact of these changes on the Guidelines. It also highlights planned improvements to the DSPI Portal to make it more user friendly, including:

- Providing more upload options within the DSPI Portal.
- Providing information/training to industry participants to assist them in using the DSPI Portal.

Section 5 summarises the proposed changes.

Stakeholders are invited to submit written responses on the proposed changes identified in this paper and the proposed amendments to the Guidelines, process description and timetable by **5.00 pm (Australian Eastern Standard time) on 30th September 2020**, in accordance with the Notice of First Stage of Consultation published with this paper.

¹ <u>https://aemo.com.au/consultations/current-and-closed-consultations/demand-side-participation-forecast-methodology-</u> <u>consultation</u>



CONTENTS

EXEC	CUTIVE SUMMARY	2		
1.	STAKEHOLDER CONSULTATION PROCESS	4		
2.	BACKGROUND	4		
2.1.	Context for this consultation	4		
2.2.	WDR rules change and impacts on the DSPI Guidelines	5		
2.3.	Relevancy of DSPI to the DER Register and/or WDR interface	5		
2.4.	Principles relevant to this consultation	6		
3.	PROPOSED AMENDMENTS TO THE DSPI GUIDELINES	7		
3.1.	Improving the completeness of the Potential Response field	7		
3.2.	Management of WDR and registration of RRO Qualifying Contracts	7		
3.3.	Update DSP program categories	8		
3.4.	Load-on capability	9		
3.5.	Enhancing detail of future DSP programs			
3.6.	Timing of DSPI Portal entry			
3.7.	Statement of no DSP to report			
3.8.	Geographic information for validation and statistics			
3.9.	Statistics of tariffs used to facilitate demand response			
3.10.	Adding participant contact details	13		
4.	PROPOSED CHANGES TO THE DSPI PORTAL	13		
4.1.	Providing more upload options within the DSPI Portal	13		
4.2.	Improved resources for portal users	13		
5.	SUMMARY OF PROPOSED CHANGES FOR CONSULTATION	14		
5.1.	Summary of proposed changes to the DSPI Guidelines	14		
5.2.	Summary of proposed changes to the DSPI Portal	15		
APPE	ENDIX A. GLOSSARY	16		

TABLES

Table 1	Indicative timeline for the consultation	
Table 2	Comparison of data collection through DSPI, DER Register and WDR interface	5
Table 3	Proposed categories for DSP Programs	9
Table 4	Add Future DSP Programs	10
	Add a Change in an Existing DSP Program	
	DSPI Portal timing	
	Glossary	



1. STAKEHOLDER CONSULTATION PROCESS

AEMO must maintain its DSPI Guidelines in accordance with the National Electricity Rules (NER) 3.7D(e)-(i). Any non-material revisions must be consulted on in accordance with the consultation procedure set out in NER 8.9.

AEMO is proposing a number of changes to the DSPI Guidelines (the Guidelines), which have been outlined in this document, and is consulting on these changes.

AEMO's indicative timeline for this consultation is outlined below. Dates may be adjusted depending on the number and complexity of issues raised in submissions and any meetings with stakeholders. The National Electricity Amendment (Wholesale demand response mechanism) Rule 2020 No. 9², requires AEMO to review, and if required, amend and publish these Guidelines no later than 31 December 2020, to take effect on and from 31 March 2021.

Table 1	Indicative	timeline	for the	consultation

Deliverable	Indicative date
Issues Paper published	26 August 2020
Discussion with Forecasting Reference Group	26 August 2020
Submissions due on Issues Paper	30 September 2020
Draft Determination published	28 October 2020
Submissions due on Draft Determination	11 November 2020
Final Determination published	9 December 2020

Prior to the submissions due date, stakeholders can request a meeting with AEMO to discuss the issues and proposed changes raised in this Issues Paper.

Note that there is a glossary of terms used in this Issues Paper at Appendix A.

2. BACKGROUND

2.1. Context for this consultation

There are various drivers for this consultation on the Guidelines, including:

- AEMO's current load forecasting processes, including DSP forecasting methodology.
- AEMO's learnings on the use of the DSPI data source, both internally and from participant users.
- Alignment with the Wholesale Demand Response (WDR) rules³ (the rules are due to commence on 24 October 2021) and the Distributed Energy Resource Register (DER Register). AEMO see this consultation as an opportunity for simplifications and integrations across WDR, DSP and DER. Such opportunities may minimise stakeholder obligations, and create efficiencies for AEMO.
- Allowing participant registration of RRO qualifying contracts in compliance with NER 4A.E.1 (c). This is not currently possible.

² See: <u>https://www.aemc.gov.au/rule-changes/wholesale-demand-response-mechanism</u>

³ In accordance with clause 11.125.7 of the NER, AEMO is required to review and where necessary amend the demand side participation information guidelines to take into account the National Electricity Amendment (Wholesale demand response mechanism) Rule 2020.



2.2. WDR rules change and impacts on the DSPI Guidelines

AEMO must account for DSP information when developing load forecasts as per NER clause 4.9.1(c).

AEMO's longer-term forecasting processes (Medium Term Projected Assessment of System Adequacy [MT PASA], Energy Adequacy Assessment Projection [EAAP], Electricity Statement of Opportunities [ESOO] and Integrated System Plan [ISP]) rely on AEMO forecasting WDR response. In contrast, other forecasts (generally the short-term forecasts) will directly reflect participant offers of possible load reductions under WDR. Thus, AEMO need to account for DSP both with and without WDR.

Information submitted through the WDR process does not fully meet the requirements (see next section), hence minor updates to the DSPI process to understand potential overlap between WDR and other DSP and future growth in WDR.

For the DSPI process, the WDR rules change also specifically.

- Broadens the term DSP from load curtailment to load adjustment, i.e. DSP now includes load increase (e.g. to manage system security at time of low demand) NER 3.7D(a).
- Broadens the requirement of DSP statistics to be published by AEMO NER 3.7D(c).
- Allows participants to provide a statement to confirm they have no DSP without having to submit a formal NULL submission through the DSPI interface for each participant ID NER 3.7D(b)(2). AEMO is to define the requirements for this statement in the DSPI Guidelines NER 3.7D(e)(1)(4A).

2.3. Relevancy of DSPI to the DER Register and/or WDR interface

AEMO notes an increasingly complex energy market where DSP exists alongside Distributed Energy Resources (DER) and, from October 2021, will include Wholesale Demand Response (WDR).

Submissions to the DSP Forecasting Methodology consultation, and comments made in the Forecasting Reference Group, indicate participant concern regarding the potential for duplication of participant effort in relation to data collection across these areas. For this reason, AEMO has considered the potential to integrate the DSPI Portal with the DER register and/or WDR interface. The three data collection processes are summarised in Table 2.

	DSPI portal	DER register	WDR interface
Overview	All registered participants provide an annual snapshot of their DSP network and/or market driven programs, to support AEMO' annual demand forecasting process. AEMO's specific definition of DSP applies, which avoids overlap and gaps with the Demand and Supply forecasts.	Networks upload data based on installed devices, as part of an ongoing operational business process. The DER register only includes distributed generation data. Data is collected per the DER Register Information Guidelines.	Demand Response Service Providers (DRSPs) may apply to classify any NMI's (other than a small customer load) as WDR units, via the WDR interface. WDR is the dispatched reduction of these loads below an assumed baseline in return for access to wholesale prices.

Table 2 Comparison of data collection through DSPI, DER Register and WDR interface



Userbase and timing	Populated by registered participants. Entry of DSP data for registered participants is mandatory under clause 3.7D(b) of the NER and occurs from 31 March each year to 30 April as per the DSPI Guidelines.	Populated by networks and installers via API's and/or portal. Open all the time, constantly updated as part of the installation business process.	AEMO will update classification records to reflect DRSPs applications for customers to join/leave their WDR program, which can be at any time of year.
High level data structure	Organised by DSP program, with NMIs listed per program	DER Register Generation Information includes NMI and sub-NMI level data for all small generating units with nameplate rating < 30 MW.	WDR unit level information, associated NMIs and relevant standing data.
Data validation	DSP program data manually reviewed.	Highly automated validation through DER Register APIs or Web Portal on submission of record. Processes are being introduced to compare data in the DER Register to one or more reference data sources for validation or augmentation.	To be defined, but expected to be both manual (via AEMO WDR registration processes) and via automated checks.
Application	DSP is an important element of annual reliability forecasts. It is complex and time critical.	DER Register supports collection of statistics on DER Generation Equipment. AEMO may use DER Register information for load and reliability forecasts and for exercising its statutory functions.	WDR portfolio management to support registration process, WDR compliance, evaluation and settlement.

Based on the above table, AEMO sees DSPI, the DER Register and WDR processes as sufficiently different to warrant keeping them distinct. However, AEMO does propose to:

- Ensure sufficient information is available to identify the WDR component of DSPI via the method outlined in Section 3.2.
- Reduce the reporting burden by removing duplication of energy storage reporting between DSPI and DER register as outlined in Section 3.3.
- Address the risk of participant confusion regarding data provision via the training initiative listed in Section 4.2.

2.4. Principles relevant to this consultation

The following principles guide this consultation's considerations and priorities.

The DSPI and the portal collecting the data defined in the Guidelines should:



- Efficiently support the needs of AEMO's forecasting processes, both in terms of effort to AEMO and to participants.
- Avoid where possible duplication of participant effort across multiple data collection processes
- Comply with AEMO's confidentiality and privacy policies.
- Be simple and intuitive, or to the extent the subject matter is inherently complex, include guidance to participants on how to complete their processes within the DSPI Portal.
- Be flexibly designed to support evolution of the requirements without needing major changes.

3. PROPOSED AMENDMENTS TO THE DSPI GUIDELINES

The proposed changes to the Guidelines are addressed in the following sections.

3.1. Improving the completeness of the Potential Response field

AEMO's operational experience with the DSPI Portal found the Potential Response field to be inconsistently completed across participants. AEMO appreciates participants implementing particular types of DSP without a sufficient history may be reluctant or unable to complete this field. This challenge can be better understood through the consideration of two scenarios:

- (i) a Retailer trialling a novel tariff may not have sufficient data on which to base an estimated response.
- (ii) a participant implementing a load control system similar to their existing programs is well placed to estimate demand reduction.

The problem occurs when the DSPI Portal has an optional field for Potential Response to cater for (i) but the field is left empty by participants in cases similar to (ii). It is beneficial for forecasting to have completed information as consistent as possible, so AEMO proposes changing the portal so the Potential Response field is:

- Optional for DSP program categories which AEMO understands are not yet well understood, and therefore difficult for a participant to estimate.
- Mandatory for DSP program categories that are well understood, and it is reasonable to expect an estimate from the participant.

AEMO proposes DSP response estimates are mandatory for all but the market exposed customers and programs with customers on fixed Time-Of-Use tariffs. AEMO seeks industry feedback on the reasonableness of this, and which DSP program categories should have mandatory/optional response estimates.

A second issue is the possibility of differing interpretations of the word 'potential'. AEMO proposes to split the question into two separate components:

- Maximum potential response (MW).
- Firm (or contracted) response (MW) of particular relevance to the registration of Qualifying contracts under the Retailer Reliability Obligation (RRO) as per Section 3.2.

3.2. Management of WDR and registration of RRO Qualifying Contracts

As per Section 2.2, AEMO needs to account for DSP both with and without WDR.

However, as discussed in Section 2.3, there are no current plans to combine the DSPI Portal and WDR interface. Also, the DSPI Portal must enable participant registration of RRO qualifying contracts in compliance with NER 4A.E.1(c).



AEMO believes WDR and RRO to effectively be mutually exclusive in the context of a site performing DSP. To meet both requirements, AEMO proposes adding a mutually exclusive selection for current and future DSP programs with the following wording:

- The DSP program is currently (or will be) in WDR.
- The DSP program is currently (or will be) a registered RRO Qualifying Contract.
- Neither.

AEMO invites submissions on whether the WDR and RRO are in fact mutually exclusive, and whether the above is reasonable.

3.3. Update DSP program categories

Currently the portal's options for DSP program categories are:

- Market exposed connections, for programs below 1 megawatt (MW).
- Connections on retail time-of-use tariffs, for programs below 1 MW.
- Connections on network event tariffs, for programs below 1 MW.
- Connections on network-controlled load, for programs below 1 MW.
- Connections with energy storage, for programs below 1 MW.
- Larger connections and programs above 1 MW.

Two issues with the above categories are identified and addressed below:

- Connections with energy storage.
 - This category was relevant prior to the DER register but is no longer required. AEMO proposes removing this unnecessary category from the DSPI Portal, to support AEMO's intention of minimising participant effort.
 - Note that where energy storage is part of a package that fits a category above, it would still be required in its respective category. For example, where a battery is managed as a VPP by a network operator, the NMIs with that program would be listed under the 'Connections on network controlled load' as shown in Table 3 below.
- Larger connections and programs.
 - This category was originally included as a 'catch all', but the use of size as a dimension regardless
 of technology removes visibility of the total size of each DSP program category. AEMO proposes
 replacing this category with 'Not elsewhere classified'.
 - Note that the size dimension of this category will be removed, enabling future analysis of the total size and growth of each DSP technology

AEMO also proposes making the DSP Program categories more generic to reflect the type of control or signalling for response independent of the organisation type, as different organisation types may use a similar type of control for different purposes. The suggested DSP Program categories are listed in Table 3 along with a brief explanation of what it represents, noting that the controlled load has been separated into two; reflecting control based on set (fixed) schedules versus dynamic operation based on system conditions/spot price.



DSP Program Category	Explanation
Market exposed connections	This covers connections exposed to spot price, either directly or via pass-through contract. This includes loads responding under the WDR rules and any connections that are only spot price exposed during specific events.
Connections on fixed time-of-use tariffs	This include connections exposed to fixed time-of-use pricing, including day/night tariffs.
Connections on dynamic event tariffs	Connections, which are subject to dynamic tariffs that price consumption and/or connection costs differently for specific periods during the year. These periods are dynamically determined by the program operator and could relate to local or regional demand at the time.
Directly controlled connections (fixed schedule)	Connections directly controlled based on a set schedule for the year, irrespectively of actual demand and/or spot price at the time. This includes control of hot water load.
Directly controlled connections (dynamic operation)	Connections directly controlled (or manually instructed to) based on actual or forecast system conditions and/or price. This includes aggregated response of same battery storage systems as a virtual power plant (VPP) and reduction in air conditioner load or electric vehicle charging on extreme demand days.
Not elsewhere classified	This category allows for special cases that don't obviously fit into the above categories. Entries in this category will be reviewed by AEMO and reclassified into the above if possible.

Table 3 Proposed categories for DSP Programs

3.4. Load-on capability

As per Section 2.2, the WDR rules change will, from October 2021, change the wording about DSP in NER clause 3.7D from "curtailment" to "adjustment", acknowledging that DSP can provide both an upwards (load-on) and downwards (curtailment) response in demand from the grid.

AEMO recognises that 'load-on' is an important future area of application to help both network operators and AEMO to manage minimum demand conditions. Load-on may not always be mutually exclusive with the DSP categories proposed above, and so should not be listed as a DSP category.

To align with the WDR rule change, a Load-on field will also be included in this DSPI Portal update to support AEMO's identification of programs that include loads, embedded generation and storage that are flexible at times of minimum demand (or responding to low/negative spot prices in general).

3.5. Enhancing detail of future DSP programs

Currently the DSPI Portal user is presented with two optional text fields:

- 'Future programs' to capture new future programs or changes to existing programs.
- 'Future Deployments' to capture any committed projects or contracts where once commissioned, potential DSP response is expected to exceed 1 MW.

AEMO is concerned that:



- The field names are open to interpretation and the use of text fields do not ensure a consistent response across participants.
- The ramp up of the DSP program over time is not requested.
- It is not obvious that a program is a future program or a change to an existing program.
- There is no option to reflect if the program represents a decrease (curtailment) in demand or an increase (load-on) in demand as per section <u>3.4.</u>
- We need to capture whether a DSP program is (or will be) included in WDR or (per Section 3.2) is an RRO qualifying contract, as described in section 2.2.

To address these issues (and others described in this Issues paper), AEMO proposes to replace the two text fields with the following tables:

Table 4 Add Future DSP Programs

Field	Mandatory/Optional	Data Type
Name of Future Program	Mandatory	Free text
Increase or Decrease in Demand	Mandatory	Radio Button (Increase / Decrease)
NEM Region	Mandatory	SA/VIC/NSW/QLD/TAS
Expected Start Date	Mandatory	Date
Maximum Response (MW) (year 1)	Mandatory	Numeric value
Maximum Response (MW) (year 2)	Optional	Numeric value
Maximum Response (MW) (year 3)	Optional	Numeric value
Firm Response (MW) (Year 1)	Mandatory	Numeric value
Firm Response (MW) (Year 2)	Optional	Numeric value
Firm Response (MW) (Year 3)	Optional	Numeric value
Description	Optional	Free text
WDR or RRO Qualifying Contract	Mandatory	Radio Button (WDR/RRO/NA)

Table 5 Add a Change in an Existing DSP Program

Field	Mandatory/Optional	Data Type
Name of Existing Program	Mandatory	Free text
Increase or Decrease in Demand	Mandatory	Radio Button (Increase / Decrease)
NEM Region	Mandatory	SA/VIC/NSW/QLD/TAS
Expected Start Date	Mandatory	Date



Field	Mandatory/Optional	Data Type
Change in Maximum Response (MW) (year 1)	Mandatory	Numeric value
Change in Maximum Response (MW) (year 2)	Optional	Numeric value
Change in Maximum Response (MW) (year 3)	Optional	Numeric value
Change in Firm Response (MW) (Year 1)	Mandatory	Numeric value
Change in Firm Response (MW) (Year 2)	Optional	Numeric value
Change in Firm Response (MW) (Year 3)	Optional	Numeric value
Description	Optional	Free text
WDR or RRO Qualifying Contract	Mandatory	Radio Button (WDR/RRO/NA)

3.6. Timing of DSPI Portal entry

A submission to the DSP Forecasting Methodology recommended allowing the DSPI Portal to remain open year-round. As this feedback relates to the Guidelines, rather than the methodology, AEMO has included its consideration on the subject here. AEMO uses the DSPI to support its annual demand and reliability forecasting process, and it is essential that the information being submitted is up to date when used as input to the DSP forecast.

Currently changes are considered on a case-by-case basis as to whether they are material enough to warrant changes to the Reliability Forecast. This would not change under the options below.

There are two options for DSPI Portal entry timing:

- Retain the current April-only submission window to support the ESOO forecast development
- Make the portal open year-round to support participant entry at any time. Note however that to support the ESOO forecast development all participants <u>would still be required</u> to confirm/finalise their entries in April.

The pros and cons are explained in the table below.



Table &	5	DSPI	Portal	timing
---------	---	------	--------	--------

Option	Pro	Con
DSPI Portal is only open for submission in	No change required to systems and processes	Outside of April changes would be emailed. This is contrary to data governance best practice.
April (current)		The rules specify that data related to RRO qualifying contracts must be registered via the DSPI Portal as per NER 4A.E.1 (c)
DSPI Portal is open all year round with	Allow participants to inform AEMO of changes, using a consistent approach across the year.	AEMO IT costs for keeping the portal open, and screening, tracking and managing changes are material.
April confirmation	Data governance is improved (relative to submissions via email in other option)	Unclear how AEMO processes inputs provided outside the April submission window.

3.7. Statement of no DSP to report

Some participants may have no DSP to report. The challenge is that AEMO needs to receive confirmation that the participant has no DSP to report, to distinguish from reporting delays or omissions.

One approach is to require participants to access the portal to confirm they have no DSP to report. AEMO notes stakeholder and AEMO costs in establishing initial portal access. AEMO is reviewing opportunities to streamline the access process, but will consider alternative approaches.

3.8. Geographic information for validation and statistics

There are challenges associated with the lack of geographic specification of DSP programs in the DSPI Portal:

- Efficiency existing DSP programs are entered independent of NEM region. While AEMO does infer geographical distribution through appropriate manipulation of the associated NMI lists, it is more efficient for AEMO to process DSP programs already organised by region.
- Accuracy program-level information (for example, "Potential Response") may cover connections in more than one NEM region. AEMO will seek regional-specific information. This will support AEMO's ability to accurately report statistics on a region-level basis and use program-level information like potential response to validate its regional estimates of DSP (which are based on observed historical responses).

Section 4.1 of this document describes the DSPI Portal data structure consisting of DSP Program information (header) and associated NMI list (detail). That section describes an additional option for uploading data, which will greatly assist in the efficient execution of the above proposed change. A portal user would simply duplicate the relevant program details row in their bulk header file, and adjust the Region field (and any other fields if applicable).

3.9. Statistics of tariffs used to facilitate demand response

Following the WDR rules change, from October 2021 AEMO must annually, as outlined in NER clause 3.7D(c), publish:

Information on the types of tariffs used by Network Service Providers to facilitate demand response and the proportion of retail customers on those tariffs

AEMO believes the categories proposed in Table 3 should cover the types of tariffs offered (whether incentivising DSP or directly controlling the net load of a customer) and that AEMO can create statistics based on the information provided.



In recognition that time-of-use tariffs may not all be passed through by the retailer, AEMO requires that NSPs also provide this information to enable AEMO's compliance with the above NER clause.

In the statistics, AEMO will therefore present for each region (as in Section 3.7 above):

- Number of customers on time-of-use tariffs reported by NSPs.
- Number of customers on time-of-use tariffs reported by retailers.

The proportion will be the number reported by retailers divided by the number reported by the NSPs.

3.10. Adding participant contact details

AEMO has experienced challenges in identifying and contacting the relevant person in the participant organisation to obtain further information relating to the DSPI data entry when necessary. To address this, AEMO proposes adding the following mandatory fields within the DSPI Portal:

- Name, position, phone number and email of the primary contact person.
- Name, position, phone number and email of the secondary contact person.

The above fields would need to be entered by the user each time they make a submission.

4. PROPOSED CHANGES TO THE DSPI PORTAL

In addition to the changes to DSP data collection detailed in Section 3, AEMO is proposing the following changes that are outside the scope of the guidelines.

4.1. Providing more upload options within the DSPI Portal

The DSPI data structure consists of DSP Program information (header) and NMI list (detail) for the sites in that DSP program. Currently the DSPI Portal's processes allow data to be entered into this structure are:

- One-at-a-time entry of DSP program header data (either by keying in the DSPI Portal, or via upload of a single row file), and
- An upload process for a DSP program NMI detail list.

The above processes can be time-intensive for participants with many DSP programs. To address this, AEMO proposes providing optional alternative mechanisms for data provision. Under this arrangement, participants would be able to choose to upload:

- A 'bulk header file' containing multiple DSP program definitions and associated meta data. The ability to upload a header file would be an optional alternative to the manual entry of DSP program data via the portal, and/or
- A 'bulk NMI file' containing all NMIs that are subject to DSP programs, with a column to indicate which DSP program each NMI belongs to. The file would be structured in normalised form, that is, where a NMI belongs to multiple DSP programs, the NMI is listed on multiple rows, each with one DSP program reference.

Additionally, AEMO recognises that some participants may have multiple DSP Programs that utilise events, so AEMO also proposes a 'bulk event file' which allows events across multiple programs to be uploaded at once, rather than events per program as currently.

4.2. Improved resources for portal users

Given the necessary complexity and low frequency usage of the DSPI Portal, AEMO proposes to assist industry participants with the DSPI Portal. Such resources aim to:



- Guide users on the efficient use of the portal features.
- Reinforce AEMO's definitions used in the portal.
- Emphasise that 'Asset only' components need not be entered into the portal. For example, a retailer with knowledge of its customer's battery installation is not, of itself, an instance of DSP that is required for the portal. However, if the battery is at least partially controlled by the retailer, it is DSP and requires entry into the portal.

AEMO believes the best means of informing portal users via documentation available on the AEMO website.

AEMO proposes making participants aware of the availability of this documentation through:

- Emails to participant contacts who used the portal most recently.
- Discussion in Forecasting Reference Group (FRG) meetings in the lead up to the data entry period.
- Links to the training in the DSPI Portal.

5. SUMMARY OF PROPOSED CHANGES FOR CONSULTATION

5.1. Summary of proposed changes to the DSPI Guidelines

AEMO seeks industry feedback on the following changes:

- 1. Changing the portal so that the Potential Response field is:
 - Optional for DSP program categories which AEMO understands are not yet well understood, and therefore difficult for a participant to estimate.
 - Mandatory for DSP program categories that are well understood, and it is reasonable to expect an estimate from the participant.
 - AEMO proposes DSP response estimates are mandatory for all but the market exposed customers and programs with customers on fixed Time-Of-Use tariffs.

AEMO proposes to split the question into two separate components:

- Maximum potential response (MW).
- Firm (or contracted) response (MW) of particular relevance to the registration of Qualifying contracts under the Retailer Reliability Obligation (RRO) as per Section 3.2.
- 2. AEMO believes WDR and RRO to effectively be mutually exclusive in the context of a site performing DSP. To meet both requirements, AEMO proposes adding a mutually exclusive selection for current and future DSP programs with the following wording:
 - The DSP program is currently (or will be) in WDR.
 - The DSP program is currently (or will be) a registered RRO Qualifying Contract.
 - Neither.

AEMO invites submissions on whether the WDR and RRO are in fact mutually exclusive, and whether the above is reasonable.

- 3. Updating DSP program categories:
 - Removing 'Connections with energy storage.'
 - Changing 'Larger connections and programs" to 'Not elsewhere classified.'



- Making the DSP Program categories more generic to reflect the type of control or signalling for response independent of the organisation type.
- 4. To align with the WDR rule change; a Load-on field will also be included in this DSPI Portal update to support AEMO's identification of programs that include loads, embedded generation and storage that are flexible at times of minimum demand (or responding to low/negative spot prices in general).
- 5. Replace the two text fields with specific responses (See Section 3.5 above).
- 6. Options for the DSPI Portal timing.
 - Retain the current April-only submission window.
 - Have the portal open year-round to support participant entry at any time.
- 7. Changes to the way data is uploaded to adjust the Region field (and any other fields if applicable).
- 8. Tariffs used for demand response
 - In the statistics, AEMO will present for each region (as in Section 3.7 above):
 - i. Number of customers on time-of-use tariffs reported by NSPs.
 - ii. Number of customers on time-of-use tariffs reported by retailers.
- 9. Collecting contact details.
 - Adding mandatory fields within the DSPI Portal for the primary and secondary contact person:

5.2. Summary of proposed changes to the DSPI Portal

- 1. Providing more upload options within the DSPI Portal:
 - Upload a 'bulk header file' containing multiple DSP program definitions and associated meta data. And/or
 - A 'bulk NMI file' containing all NMIs that are subject to DSP programs, with a column to indicate which DSP program each NMI belongs to.
- Additionally, for multiple DSP Programs that utilise events, AEMO also proposes a 'bulk event file.'
- 2. AEMO proposes to Provide resources to assist industry participants with the DSPI Portal. Such resources aim to:
 - Guide users on the efficient use of the portal features.
 - Reinforce AEMO's definitions used in the portal.
 - Emphasise that 'Asset only' components need not be entered into the portal.



APPENDIX A. GLOSSARY

The words, phrases and abbreviations in the table below have the meanings set out opposite them when used in these Procedures.

Terms defined in the National Electricity Law and the NER have the same meanings in these Procedures unless otherwise specified in this clause.

Defined terms/Terms defined in the NER are intended to be identified in these Procedures by italicising them, but failure to italicise a defined term does not affect its meaning.

Term	Definition
AEMO	Australian Energy Market Operator
DER	Distributed Energy Resources
DSP	Demand Side Participation
EAAP	Energy adequacy assessment projection
ESOO	Electricity statement of opportunities
MT PASA	Medium term PASA
MW	Megawatt
NEM	National Electricity Market
NMI	National Meter Identifier
NSP	Network Service Provider
NER	National Electricity Rules
PASA	Projected assessment of system adequacy process
RERT	Reliability and emergency reserve trader
VPP	Virtual power plant
WDR	Wholesale Demand Response

Table 7 Glossary