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Energy Forecasting Team
Australian Energy Market Operator
Submitted by email: energy.forecasting@aemo.com.au

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To whom it may concern

RE: Amendments to demand side participation information guidelines Issues Paper

Thank you for the opportunity to provide feedback on the Australian Energy Market Operator's (AEMO) proposed amendments to the demand side participation information guidelines.

Enel X works with commercial and industrial energy users to develop demand-side flexibility and offer it into wholesale capacity, energy and ancillary services markets worldwide, as well as to network businesses. We have over 50 demand response programs in 20 countries, which involve altering customers' consumption patterns and controlling onsite generation. In the NEM, Enel X participates in the energy and frequency control ancillary services (FCAS) markets, offers network support to distribution businesses and has developed reserves for AEMO under the RERT framework, including through the ARENA/AEMO demand response trial.

Enel X considers that amendments to the DSPI should focus on improving the user experience. The portal interface and its requirements should be clear, intuitive and easy to use. A positive user experience is likely to maximise the response rate and the usefulness of the information provided.

If you have any questions relating to this submission, please do not hesitate to contact me.

Regards

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Table 1: Comments on the consultation questions

	Consultation question	Enel X’s view
Summary of proposed changes to the DSPI Guidelines		
1	<p>Proposed changes to the Potential Response field:</p> <ul style="list-style-type: none"> • 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 • DSP response estimates are mandatory for all but the market exposed customers and programs with customers on fixed Time-Of-Use tariffs • Split the question into two separate components: maximum potential response and firm (or contracted) response 	<p>We agree that this portal, and DSP in general, is still not well understood across the industry, and therefore response fields should be optional wherever possible.</p> <p>DSP will constantly be evolving, and we will continually be developing new DSP resources in future. We will not always have all the relevant information for the DSPIP at any given time.</p> <p>AEMO should err on the side of caution in making too many categories and response fields “mandatory” as this will dilute the response rate and quality of responses.</p> <p>Fields should be optional unless AEMO can demonstrate that it needs to know the information for the purposes of system security and reliability. The questions need to be simple to respond to and not too onerous on Market Participants to avoid administrative burden.</p> <p>Enel X is comfortable with AEMO differentiating between maximum potential response and firm (or contracted) response.</p>
2	<p>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:</p> <ul style="list-style-type: none"> • The DSP program is currently (or will be) in WDR. • The DSP program is currently (or will be) a registered RRO Qualifying Contract. • Neither. 	<p>No comment.</p>

	AEMO invites submissions on whether the WDR and RRO are in fact mutually exclusive, and whether the above is reasonable.	
3	<p>Updating DSP program categories:</p> <ul style="list-style-type: none"> • 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. 	Enel X supports AEMO’s proposed approach.
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)	Enel X supports AEMO’s proposed approach.
5	Replace the two text fields with specific responses	<p>Enel X agrees with this approach in principle, but in our view only the following should be mandatory fields:</p> <ul style="list-style-type: none"> • Name of program • NEM region • Maximum response / firm MW
6	<p>Options for the DSPI Portal timing.</p> <ul style="list-style-type: none"> • Retain the current April-only submission window. • Have the portal open year-round to support participant entry at any time. 	Enel X supports having the portal open year-round to support participant entry if it provides value to AEMO operations for upcoming summers. Our preference would be to have submission window that does not coincide with a holiday period, when internal resources may be limited.
7	Changes to the way data is uploaded to adjust the Region field (and any other fields if applicable).	There should be a simple upload process with a simple CSV template.
8	<p>Tariffs used for demand response</p> <ul style="list-style-type: none"> • In the statistics, AEMO will present for each region (as in Section 3.7 above): <ul style="list-style-type: none"> i. Number of customers on time-of-use tariffs reported by NSPs. 	No comment.

	ii. Number of customers on time-of-use tariffs reported by retailers.	
9	Collecting contact details. <ul style="list-style-type: none"> • Adding mandatory fields within the DSPI Portal for the primary and secondary contact person 	This should only be done once at the start of the process, and not for every DSP site for which a survey must be submitted.
Summary of the proposed changes to the DSPI Portal		
1	Providing more upload options within the DSPI Portal: <ul style="list-style-type: none"> • 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.' 	Enel X supports AEMO's proposed approach.
2	AEMO proposes to Provide resources to assist industry participants with the DSPI Portal. Such resources aim to: <ul style="list-style-type: none"> • 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. 	Enel X supports this approach, provided that the DSPI Portal itself is intuitive, straightforward to use and provides a positive user experience. The Guide should only be used as a reference document (secondary tool). We seek clarification from AEMO on what is meant by the third point that "asset only" components do not need to be entered into the portal.