

16 November 2020



Ms Audrey Zibelman
Chief Executive Officer and Managing Director
Australian Energy Market Operator Limited
PO Box A2449
SYDNEY SOUTH NSW 1235

wdr@aemo.com.au

Dear Ms Zibelman

**Market and System Operation Procedures, Methodologies and Guidelines
(Wholesale Demand Response)**

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) in response to the *Market and System Operation Procedures, Methodologies and Guidelines (Wholesale Demand Response) Issues Paper* (issues paper). AEMO has requested feedback on proposed changes outlined in the issues paper to market and system operation procedures, methodologies and guidelines that result from the Wholesale Demand Response rule changes which will take effect from 24 October 2021.

Energy Queensland is generally supportive of the changes proposed by AEMO. However, with respect to the Market Suspension Compensation Methodology, Energy Queensland recommends that when calculating the capacity-weighted average of the benchmark costs (as per final rule clause 3.14.5A(h)(2A)), only *available* Scheduled Generators should be included in the calculation (rather than all Scheduled Generators of that class). That is, generators that are not available, for example due to an outage, should be excluded from the calculation.

Should AEMO require additional information or wish to discuss any aspect of this submission, please contact me on 0467 782 350 or Charmain Martin on 0438 021 254.

Yours sincerely

A handwritten signature in black ink, appearing to read "Trudy Fraser", enclosed in a thin black rectangular border.

Trudy Fraser
Manager Regulation

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