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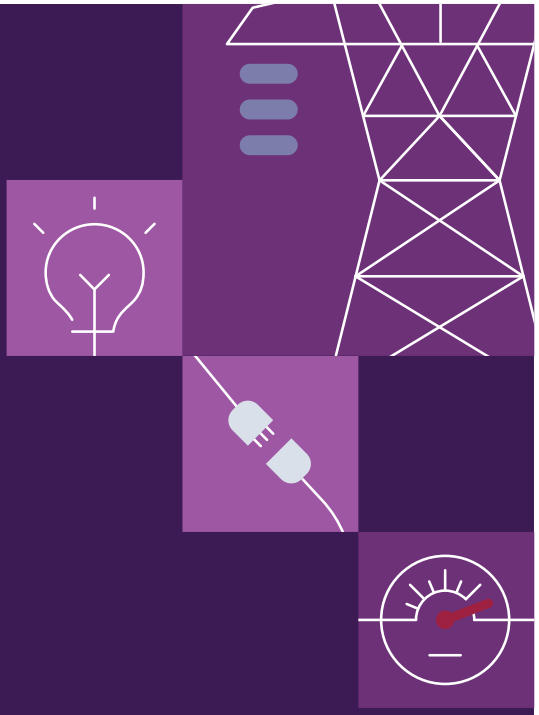

Price Responsive Reporting Guidelines

Consultation paper – Standard consultation for the National Electricity Market

Published: 10 April 2025

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New South Wales | Queensland | South Australia | Victoria | Australian Capital Territory | Tasmania | Western Australia

Australian Energy Market Operator Ltd ABN 94 072 010 327

Explanatory statement and consultation notice

This consultation paper commences the first stage of the standard rules consultation procedure conducted by AEMO to consider proposed content for the Price Responsive Reporting Guidelines (**proposal**) under National Electricity Rules (**NER**) clauses 3.10C.2(e)-(g) and 11.180.3(a). The standard rules consultation procedure is described in NER 8.9.2.

A suggested strawman of the Price Responsive Reporting Guidelines (**Guidelines**) reflecting the proposal is published with this consultation paper to guide the discussion with stakeholders.

The detailed sections of this consultation paper include more information on the proposal and AEMO's reasons for making it.

Consultation notice

AEMO is now consulting on this proposal and invites written submissions from interested persons on the issues identified in this paper to NEMReform@aemo.com.au **by 5:00pm (Melbourne time) on Tuesday 17 June 2025**.

Submissions may make alternative or additional proposals you consider may better meet the objectives of this consultation and the national electricity objective in section 7 of the National Electricity Law. Please include supporting reasons.

Before making a submission, please read and take note of AEMO's consultation submission guidelines, which can be found at https://aemo.com.au/consultations. Subject to those guidelines, submissions will be published on AEMO's website.

Please identify any parts of your submission that you wish to remain confidential, and explain why. AEMO may still publish that information if it does not consider it to be confidential, but will consult with you before doing so. Material identified as confidential may be given less weight in the decision-making process than material that is published.

Submissions received after the closing date and time will not be valid, and AEMO is not obliged to consider them. Any late submissions should explain the reason for lateness and the detriment to you if AEMO does not consider your submission.

Interested persons can request a meeting with AEMO to discuss any particularly complex, sensitive or confidential matters relating to the proposal. Please refer to NER 8.9.1(k). Meeting requests must be received by the end of the submission period and include reasons for the request. We will try to accommodate reasonable meeting requests but, where appropriate, we may hold joint meetings with other stakeholders or convene a meeting with a broader industry group. Subject to confidentiality restrictions, AEMO will publish a summary of matters discussed at stakeholder meetings.

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1. Stakeholder consultation process

As required by the National Electricity Rules (**NER**) clause 3.10C.2(e)-(g), AEMO is consulting on the proposed AEMO price responsive reporting guidelines (**proposal**) in accordance with the Standard rules consultation procedure in NER 8.9.2.

Note that this document uses terms defined in the NER, which are intended to have the same meanings.

As per NER 11.180.3, AEMO must publish the final AEMO price responsive reporting guidelines (Guidelines) by 31 December 2025. Accordingly, AEMO's indicative process and timeline for this consultation are outlined below. Future dates may be adjusted, and additional steps may be included if necessary as the consultation progresses.

Consultation steps	Dates
Publication of Final High Level Implementation Assessment for Integrating Price Responsive Resources into the NEM[A]	Thursday, 20 March 2025
Consultation paper published	Thursday, 10 April 2025
Presentation to Electricity Wholesale Consultative Forum[B]	Tuesday, 6 May 2025
Submissions due on consultation paper	Tuesday, 17 June 2025
Draft report published	Expected Monday, 18 August 2025
Submissions due on draft report	Expected Friday, 10 October 2025
Final report published	Expected Wednesday, 10 December 2025

A. See https://aemo.com.au/-/media/files/initiatives/integrating-price-responsive-resources-into-the-nem/iprr---hlia---v11-for-publication.pdf.
B. See https://aemo.com.au/consultations/industry-forums-and-working-groups/list-of-industry-forums-and-working-groups/electricity-wholesale-consultative-forum.

2. Background

2.1. Context for this consultation

On 19 December 2024, the Australian Energy Market Commission (**AEMC**) made the National Electricity Amendment (Integrating price-responsive resources into the NEM) Rule 2024[1], which establishes a framework called "dispatch mode" that allows aggregated price responsive resources including consumer energy resources (**CER**), other distributed energy resources (**DER**) and price-responsive loads to be scheduled and dispatchable in the NEM.

Currently, unscheduled price-responsive resources (**PRR**) are not able to participate in dispatch, meaning they are not effectively integrated into the National Electricity Market's (**NEM**'s) planning and operation functions and are not visible to AEMO or the electricity market. Inability to participate in dispatch and energy markets therefore restricts these currently unscheduled PRR from contributing to the real-time matching of supply and demand, and from potential value streams accessible to scheduled resources in the market that could enhance benefits to consumers who own CER, such as regulation frequency control ancillary services (**FCAS**).

The AEMC's final rule is the last stage of the rule change request process that was initiated by AEMO's January 2023 rule change proposal for the 'Scheduled Lite Mechanism'. This rule change request was developed in accordance with the final recommendations made by the Energy Security Board (**ESB**) to Energy Ministers as part of its Post 2025 Market Design work[2].

Many PRR will not be capable of participating, or will not choose to participate, in dispatch mode. As the magnitude of these resources grows, AEMO will face further challenges forecasting demand in the NEM. To help understand the magnitude of this issue, the AEMC's final rule introduces monitoring and reporting functions for AEMO and the Australian Energy Regulator (**AER**) that will position the market bodies and participants to evaluate the impact of unscheduled PRR on AEMO's forecasts.

2.2. NER requirements

This section provides the requirements placed on AEMO by the AEMC's final Integrating Price Responsive Resources (**IPRR**) rule in relation to reporting on unscheduled PRR.

NER 3.10C.2 states:

Objective of AEMO reporting

(a) The objective of the monitoring and reporting framework established by this clause is for AEMO to:

(1) monitor and report on the impacts of unscheduled price responsive resources on forecast deviations; and

(2) identify market outcomes as a result of the use of unscheduled price responsive resources.

Annual reporting

[1] See https://www.aemc.gov.au/rule-changes/integrating-price-responsive-resources-nem.

[2] See https://esb-post2025-market-design.aemc.gov.au/.

(b) By 30 September each year, AEMO must prepare and publish, in accordance with the AEMO price responsive reporting guidelines, a report which includes the following information in respect of the previous financial year:

(1) an analysis of the statistics and trends of:

(i) the volumes and types of unscheduled price responsive resources reported by Registered Participants, using the DER register information and demand side participation information; and

Note

AEMO must report on demand side participation information, no less than annually, under rule 3.7D(c).

AEMO may use DER register information for the purpose of the exercise of its statutory functions under the NEL or Rules under rule 3.7E(e).

(ii) patterns in forecast deviations, including to the extent identifiable, the approximate contribution of unscheduled price responsive resources to forecast deviations, in response to forecast and actual spot prices;

(2) AEMO's best estimate of the impact of unscheduled price responsive resources on forecast deviations in relation to additional amounts paid to:

(i) Ancillary Service Providers for additional ancillary services that are enabled; and

(ii) Cost Recovery Market Participants for ancillary service transaction payments under clause 3.15.6AA;

(3) an assessment of the degree of forecast deviations in regional demand across a range of market conditions, as well as the factors contributing to the size of forecast deviations;

(4) analysis of impacts of unscheduled price responsive resources on the load forecast used by AEMO for pre-dispatch and dispatch, including in comparison with outcomes published in previous reports prepared in accordance with this clause (as applicable);

(5) identification of additional information or inputs required to improve or account for unscheduled price responsive resources in load forecasts;

(6) a description of any actions taken by AEMO to reduce forecast deviations by accounting for unscheduled price responsive resources, where those actions have resulted in improved market outcomes;

(7) a description of:

(i) the methodologies used by AEMO to consider and manage the impacts of unscheduled price responsive resources on load forecasts for pre-dispatch and dispatch; and

(ii) any barriers to AEMO using those methodologies to improve forecasting; and

(8) any other relevant information AEMO considers necessary or convenient to include in the report.

Quarterly data

(c) AEMO must develop, publish and maintain a single source of information for unscheduled price responsive resources that presents the information and metrics specified by the AEMO price responsive reporting guidelines.

(d) AEMO must update the information published under paragraph (c) when new information becomes available and at least once each calendar quarter.

AEMO price responsive reporting guidelines

(e) AEMO must develop and publish, and may amend, the AEMO price responsive reporting guidelines in accordance with the Rules consultation procedures.

(f) The AEMO price responsive reporting guidelines must specify:

(1) how AEMO will meet its reporting obligations under paragraph (b); and

(2) the information and metrics that AEMO will include in the reporting required pursuant to paragraph (c).

(g) In satisfying its obligations under paragraphs (b) and (c), AEMO may:

(1) utilise existing AEMO monitoring and reporting frameworks under the Rules;

(2) utilise data, reports and systems otherwise available to AEMO; and

(3) take into account or include any other information that AEMO reasonably considers relevant to meet the objective set out in paragraph (a).

Furthermore, the transitional rules in NER 11.180.3 state:

(a) For the purposes of new clause 3.10C.2(c), AEMO is not required to publish the single source of information until 1 April 2026, in respect of information for the preceding calendar quarter.

(b) By 30 September 2026, AEMO must publish the first report required by new clause 3.10C.2(b).

(c) The first annual report published by AEMO pursuant to paragraph (b) is not required to cover the entire financial year ending 30 June 2026, but instead, must:

(1) cover the period from 1 January 2026 to 30 June 2026; and

(2) also include an analysis of trends in the use and impact of unscheduled price responsive resources over the preceding three years, where such analysis is based on information reasonably available to AEMO at the time.

2.3. The national electricity objective

Within the specific requirements of the NER applicable to this proposal, AEMO will seek to make a determination that is consistent with the national electricity objective (**NEO**) and, where considering options, to select the one best aligned with the NEO.

The NEO is expressed in section 7 of the National Electricity Law (**NEL**) as:

to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:

(a) price, quality, safety, reliability and security of supply of electricity; and

(b) the reliability, safety and security of the national electricity system; and

(c) the achievement of targets set by a participating jurisdiction—

(i) for reducing Australia's greenhouse gas emissions; or

(ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.

3. How reporting obligations will be met

AEMO has produced a strawman of the Guidelines to illustrate how the requirements set out in NER 3.10C.2 can be met.

This consultation document will discuss the strawman Guidelines and highlight key design decisions relevant for meeting the NER requirements. At those places, in particular, the strawman Guidelines have questions listed for interested parties to comment on in their submissions to the Proposal.

While the strawman Guidelines have been created to start discussion, in this first stage of the consultation AEMO will consider any changes, including major changes, and invites any feedback interested parties wish to make.

A summary of questions can be found in Section 5.

3.1. Description and effect of proposal

Following completion of the consultation process no later than 31 December 2025, the final Guidelines will be published and take effect, noting the transitional rules outlined in Section 3.2 below.

The Guidelines do not impose any direct impacts on participants, but rather govern information published by AEMO for interested parties. The information published does rely on information provided by various participants to AEMO's DER Register and Demand Side Participation Information (**DSPI**) portal, and accurate information is required to ensure AEMO's reporting is meaningful and useful in guiding whether forecast improvements are required.

3.2. How the proposal meets the objectives

These Guidelines, subject to this consultation, will govern what information AEMO will be reporting on its website, both with regards to:

- single source of information, as per NER 3.10C.2(c);
- quarterly reporting, as per NER 3.10C.2(d); and
- annual reporting, as per NER 3.10C.2(b).

Furthermore, the initial reporting, both quarterly and annual, will consider the transitional rules outlined in NER 11.180.4, including that:

- the single source of quarterly information is not required until 1 April 2026 and covers the preceding calendar quarter; and
- the first annual report is not required till 30 September 2026, and this first annual report is only required to cover the period 1 January 2026 to 30 June 2026 and to include analysis of the preceding three years where such data is available.

4. Key design decisions in the strawman Guidelines

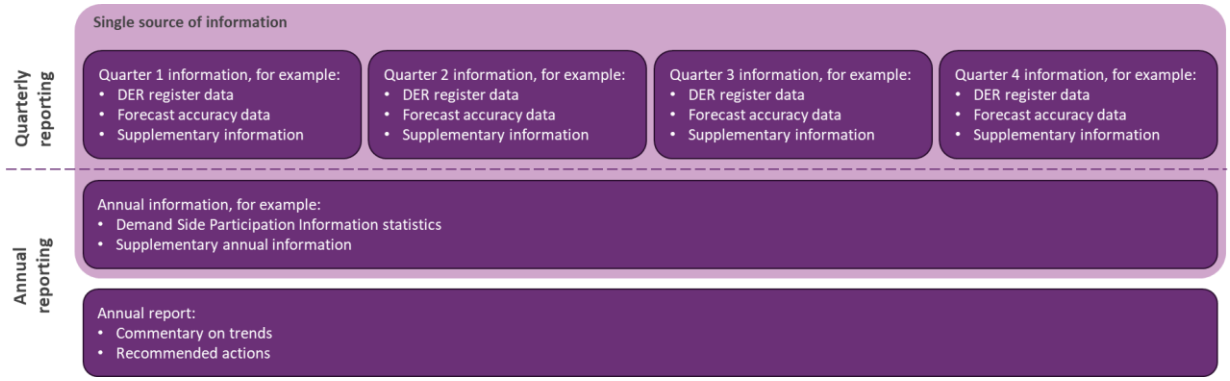
This section highlights the key design decisions in the strawman Guidelines and outlines the reasoning for AEMO's current position, which AEMO welcomes any feedback on. It should be read as a companion document to the strawman Guidelines, rather than by itself.

4.1. Single source of information

To meet the requirements of establishing a single source of information as per NER 3.10C.2(c), AEMO proposes to create this as a compilation of several resources. It will build on AEMO's DER Register and DSPI survey processes, as referenced in NER 3.10C.2(b)(1), supplemented with forecast accuracy information as outlined in subsequent sections of this document.

The DER Register and AEMO's DSPI statistics are updated at different intervals, so not all data will be available with quarterly resolution. The following diagram outlines the content of this information source, which will be accessible from a single location.

Figure 1 AEMO's single source of information



In accordance with the transitional rules, NER 11.180.4(a), AEMO is not required to publish the single source of information until 1 April 2026. AEMO will establish the single location to access the information from before or on that date, but not all data for the previous quarter (January till March 2026) will be available on that date, because the processes to update the DER Register for example takes several weeks following the end of the quarter. This is in line with NER 3.10C.2(d), which requires updates at least quarterly, but without specifying a date.

Note that AEMO's DSPI survey statistics are only updated annually, typically with the publication of AEMO's Electricity Statement of Opportunities for the NEM in August each year. Rather than duplicating the same data over four quarters, this will for efficiency only be published at an annual level.

4.2. Quarterly reporting

The quarterly reporting makes up most of the single source of information resource introduced above. The following discusses various considerations on the data provided in the quarterly reporting.

4.2.1. Provide at least three years of data where possible

A number of factors impact demand, and impacts from temperatures and distributed photovoltaics (**DPV**) generation will have a bigger impact on demand outcomes than price. To see any impact from prices on forecast accuracy, several years of data will be needed.

With CER continuing to evolve, data series may change as new technologies emerge or new improved data sets become available. As a result, three years of data may not always be available. Including more than three years may be appropriate at times, but due to the rapid transition of the energy system and changes to forecast methodologies, data beyond three years may no longer be relevant.

As a balance, AEMO propose to show three years of data (when available), but may show more when warranted. This is also in line with the transitional rules, NER 11.180.4(c)(2), which specify the first reporting should have analysis of the three preceding years, where such data is reasonably available to AEMO, but noting the wording in NER 3.10C.2 is more flexible than this.

4.2.2. Calendar or seasonal quarters

Calendar quarters (January-March, April-June, July-September, October-December) have been selected to align with the financial year annual reporting requirement, and to align with the existing reporting of AEMO's DER Register data and Quarterly Energy Dynamics report. This is also in line with the transitional rules, NER 11.180.4(a), which specify the first reporting should be on a calendar quarter basis, noting the wording in NER3.10C.2 otherwise provides more flexibility than this.

AEMO considered seasonal quarters, reflecting summer, autumn, winter and spring months, but grouping forecast accuracy data by season rather than calendar quarters would likely not make a material difference to the reporting.

4.2.3. CER trends

DER Register information

To highlight trends in CER uptake, AEMO will publish information based on its DER Register. This register currently only has three categories of technologies, but AEMO proposes to split that into further subcategories to better observe growth across smaller CER segments. The suggested categories are:

- installed capacity of DPV in megawatts (**MW**), split into:
  - rooftop PV (<100 kilowatts [kW] installed capacity);
  - smaller PV non-scheduled generation (**PVNSG**) (100 kW to 1 MW); and
  - larger PVNSG (1 MW to 30 MW[3]).
- installed capacity of distributed battery storage systems in MW split into:
  - smaller distributed batteries (<100 kW installed capacity);
  - larger distributed batteries (100 kW to 5 MW); and

[3] Certain systems <30 MW will be excluded if part of operational demand, with those exceptions outlined in the *Demand Terms in the EMMS Data Model* document: https://aemo.com.au/-/media/files/electricity/nem/security_and_reliability/dispatch/policy_and_process/demand-terms-in-emms-data-model.pdf

- other CER technologies than those above, as reported to the DER register (for example, small-scale wind farms or diesel back-up generators).

These sub-segments have been selected for the availability of data sets and also for the level of price exposure. For DPV and batteries, the smaller segments (<100 kW) are less likely to be controlled in response to price, where for DPV, the segment from 1 MW to 30 MW is already now very responsive to price.

Additional DER data

It should be noted that AEMO does not currently collect quarterly data about electric vehicles (**EVs**) or their charging infrastructure, although, should this become available, AEMO will include it in the quarterly reporting. Until such time, AEMO proposes to provide some supplementary information at annual level as outlined in Section 4.3.3.

AEMO's DER Register only reports on installed capacities and does not have information about commercial arrangements that may affect the operation of those assets. That information is collected through AEMO's annual DSPI survey. As this is only available at annual level, is will not be part of the quarterly reporting, but rather part of the annual reporting process as discussed in Section 4.3.1.

4.2.4. Forecast accuracy

Time slices

AEMO will assess forecast accuracy each quarter. This will be done for each region across all half-hours in the quarter, plus at least for the following three time slices (local time):

- 5:30pm to 7:30pm – typical peak demand period;
- 11:00am to 1:00pm – typical minimum demand period; and
- 1:00am – 5:00am – typical overnight demand period.

The time slices will allow estimates of trends for example at time of peak, where prices may typically be higher, to see if forecast accuracy differs from the quarterly average at that time.

Forecast accuracy measures

AEMO proposes to use two performance metrics to measure the long-term performance of its load forecasts:

- root mean square error (**RMSE**) – this metric is used to measure the *accuracy* of a forecast by examining how spread out / dispersed the forecast deviations are; and
- mean bias error (**MBE**) – this metric is used to measure the *bias* in a forecast, that is whether it is trending too high or low overall.

Forecast lead times

AEMO must assess the accuracy of both dispatch and pre-dispatch forecasts. For pre-dispatch, AEMO proposes to measure the performance of load forecasts with the lead times one and four hour ahead. AEMO has determined these lead times best align with decision-making impacting PRR:

- One-hour ahead – several market participants have advised AEMO that the accuracy up to an hour ahead is important for preparing bids for generators and in particular bi-directional units.

- Four-hour ahead – AEMO interventions, such as use of Reliability and Emergency Reserve Trader (**RERT**), may have significant lead times, with activation of RERT often required several hours ahead of when it is forecast to be required. The four-hour ahead forecast captures the accuracy at this decision point. Two-hour ahead was found to be too close to the one-hour ahead and can be approximated by looking at the one-hour and four-hour ahead forecast accuracy.

Impacts of price-responsive resources on forecast deviations

AEMO must undertake analysis of forecast deviations in response to both forecast and actual spot price.

For dispatch, apart from the actual price, AEMO proposes to use the forecast price made five minutes before dispatch as the most likely price to impact operation of unscheduled PRR.

For the forecast deviations one-hour ahead and four-hour ahead, the analysis will be done using the one-hour ahead and four-hour ahead pre-dispatch prices respectively, as these would be the prices incentivising price-responsive behaviour at those lead times.

AEMO is proposing to use correlation between forecast deviation and various variables like DPV uptake as an indicator for the impact of PRR on forecast deviations.

For ancillary service payments, AEMO proposes a similar approach looking at the correlation between forecast deviation, using metrics such as MBE, and the volumes and costs in ancillary service payments. Analysing this for ancillary service costs alone is not sufficient, because an increase or decrease in the number of ancillary service providers can affect the price of these services.

4.2.5. Supplementary information

AEMO proposes to supplement the single source of information with additional resources, noting such information is subject to availability of this data and not governed by the Guidelines.

Examples of data that AEMO may provide links to from the single source of information location are:

- AEMO's Interval Metering uptake dashboard[4] – a smart meter is typically required as enabler for flexible tariff offerings, noting that as smart meter penetration approaches 100%, the penetration becomes a less relevant indicator of possible change.
- AEMO's Quarterly Energy Dynamics reports[5] – discussions of quarterly price outcomes and demand trends may be relevant as context to understand the observed quarterly forecast deviations.

4.3. Annual reporting

Each year, at the end of September, AEMO must publish an annual report covering the preceding financial year.

4.3.1. CER trends

A key part of the annual CER trends will be covered by the relevant four quarters of the quarterly reporting of CER trends based on the DER Register as discussed in Section 4.2.3.

This will be supplemented by AEMO's DSPI statistics, which are updated annually, typically in August.

[4] At https://aemo.com.au/energy-systems/electricity/der-register/data-der/data-dashboard.

[5] At https://aemo.com.au/energy-systems/major-publications/quarterly-energy-dynamics-qed.

The DSPI statistics provide information about the commercial arrangements down to each customer, indicating customers that are market exposed, or subject to tariffs that either statically or dynamically incentivise consumption at particular times.

AEMO's most recent publication of DSPI statistics is Appendix A6.3 in the 2024 Electricity Statement of Opportunities for the NEM[6].

The statistics will, where possible, include current and up to three years of historical data. For the purpose of price-responsive reporting, AEMO will, where identifiable, seek to particularly highlight trends of:

- number of customers on dynamic (including market pass-through) tariffs;
- number of customers on tariffs specifically targeting EV charging (if available separate from above);
- number of customers being part of a virtual power plant (**VPP**); and
- number of customers that are subject to dynamic operating envelopes – typically flexible export limits (**FELs**) imposed on DPV, but limits can be bidirectional (for example, for batteries or purely for import, such as for EV fast charging stations).

The latter group is not price-responsive, but the operation of it may be correlated with price, so understanding the growth of the uptake is important to allow a wider discussion of whether forecast deviations are driven by increase in unscheduled PRR or simply growth in FELs enabled DPV.

Where the DSPI includes data on whether customers are part of voluntarily scheduled resources (**VSR**), a further breakdown of the data above into VSR and non-VSR customers will be provided and discussion will be focused on the non-VSR segments.

4.3.2. Forecast accuracy

AEMO does not propose to do any specific analysis at annual level – rather the annual reporting will consist of the four quarters that made up the financial year. The annual report will provide commentary of the observed trends as outlined in Section 4.3.4.

4.3.3. Supplementary information

As with the quarterly reporting, AEMO proposes to supplement the single source of information with additional annual resources, noting such information is subject to availability of this data and not governed by the Guidelines.

Examples of annual data that AEMO may provide links to from the single source of information location are:

- AEMO's Inputs, Assumptions and Scenarios Report (**IASR**) and associated workbooks from AEMO's Integrated System Plan (**ISP**) process.
- AEMO's Forecasting Assumption Update (**FAU**) and associated workbooks, typically published in years where AEMO does not publish an ISP.

The supplementary information suggested above will have historical and forecast uptake of CER technologies, including EV updates and usage, although certain estimates – typically provided by

[6] At https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/nem_esoo/2024/2024-electricity-statement-of-opportunities.pdf.

consultants – may not be 100% consistent with the data provided by the DER Register included as part of the single source of information, for example DPV uptake, noting the DER Register does not include EV data.

4.3.4. Content of annual report

In addition to the single source of information providing quarterly and annual data, AEMO will publish an annual report. AEMO proposes that this report includes:

- Analysis and discussion of:
  - the volumes and types of reported unscheduled price responsive resources as per Section 4.3.1;
  - patterns and trends in identified forecast deviations, including to the extent identifiable, the approximate contribution of unscheduled PRR to:
    - forecast deviations overall (both pre-dispatch and dispatch time-frames); and
    - additional amounts paid to Ancillary Service Providers and Cost Recovery Market Participants; and
  - the degree of forecast deviations in regional demand across a range of market conditions, as well as the factors contributing to the size of forecast deviations, such as time slices.
- Based on issues highlighted above, the report will describe:
  - actions planned or already taken by AEMO to reduce forecast deviations by improved accounting for unscheduled PRR (directly or indirectly)[7].
  - any barriers to AEMO using those methodologies to improve forecasting, including additional information or inputs required to improve or account for unscheduled PRR in load forecasts.

[7] AEMO's Load Forecasting procedure (SO OP 3710) will be updated accordingly. See https://aemo.com.au/-/media/files/electricity/nem/security_and_reliability/power_system_ops/procedures/so_op_3710-load-forecasting.pdf.

5. Summary of issues for consultation

Submissions may be made on any matter relating to the proposal discussion in this consultation paper or the accompanying strawman Guidelines. AEMO would welcome particular comment and feedback on the questions outlined in the strawman Guidelines, as summarised below:

1. Is there additional content that the Guidelines should cover?
2. Do you agree with the composition of the single source of information?
3. Do you agree that three years of data is sufficient?
4. Do you agree that calendar quarters as proposed is appropriate for quarterly reporting?
5. Do you agree the proposed DER Register groupings provide a reasonable breakdown on CER technologies?
6. Do you agree the proposed time slices are the most relevant to consider forecast accuracy for?
7. Relative to the proposed RMSE and MBE, are there better forecast performance metrics to consider – and if so, why?
8. For the pre-dispatch forecast accuracy, would any other lead times be more relevant than one-hour ahead and four-hour ahead – and if so, why?
9. Would any other forecast price than the five minutes ahead pre-dispatch price be more relevant – and if so, why?
10. Can you suggest any better methods for identifying impacts of PRR on forecast deviations?
11. Can you suggest any better methods for identifying impacts of unscheduled PRR on forecast deviations in relation to Ancillary Service payments?
12. Do you support the concept of supplementary information resources?
13. Are there any other demand side participation (**DSP**) statistics that should be provided?
14. Is there any other annual data on CER that AEMO should provide?
15. Apart from what has been outlined, is there any further information that should be included in the annual report?