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Draft Report and Determination: Demand Side Participation Information Guidelines

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its Draft Report and Determination on the *Demand Side Participation (DSP) Information Guidelines* (Draft Report). This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited, Ergon Energy Corporation Limited and Ergon Energy Queensland.

Energy Queensland agrees that annual submission of data between 31 March and 30 April commencing in 2018 as outlined in the Draft Report is reasonable. Although aligning the submission with other related data submissions will help to minimise costs this does not mean that the costs will be insignificant.

Energex and Ergon Energy operate extensive load control programs involving hundreds of thousands of customers. In some instances these programs operate on a base schedule with more targeted variations for specific areas and other programs are triggered based on particular network constraints meaning that their operational times can vary on a daily basis. Therefore, gathering this information from existing systems will be a complex task, even at an aggregated level.

The Draft Report proposes that National Metering Identifiers (NMIs) associated with particular load categories (e.g. hot water, air conditioning, pool pumps) be separately grouped. However, in some cases this information is not known. For example, Energex is able to isolate NMIs with air conditioning load control but other load control programs are associated with an individual tariff without knowledge of what particular appliance may be connected behind the meter. The Draft Report emphasises the provision of data captured from current business processes in which case aggregation would be performed based on the groupings currently available.

Energy Queensland acknowledges that the proposed data submission format being via web portal is an improvement on the previously suggested method. However, Energy Queensland is unable to comment on the ease with which data could be uploaded without first previewing the web portal. Although it is stated that the portal will be able to accommodate the uploading of CSV files it is unclear whether the file/s would

represent the entirety of Sections 1 and 2 or be associated only with particular fields (e.g. NMI(s)) in which case the remaining fields would still require manual data entry. Notwithstanding, the system should be robust enough to handle the uploading of very large CSV files.

Due to the complexity involved in assembling the requested DSP data Energy Queensland is committed to adopting a best endeavours approach for the inaugural submission in 2018. We request that AEMO undertake a review of the DSP Guidelines after implementation to ensure they add value and that the costs of compliance are outweighed by the benefits to energy market stakeholders and consumers of electricity.

Should you require additional information or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Jenny Doyle', with a long horizontal flourish extending to the right.

Jenny Doyle
General Manager Regulation and Pricing

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