



AGL Energy Limited

ABN: 74 115 061 375
Level 24, 200 George St
Sydney NSW 2000
Locked Bag 1837
St Leonards NSW 2065
t: 02 9921 2999
f: 02 9921 2552
agl.com.au

AEMO – Wholesale Demand Response Guideline Consultation

via email: wdr@aemo.com.au

27 November 2020

AGL Response to AEMO Wholesale Demand Response Guidelines issues paper

AGL Energy (AGL) welcomes the opportunity to comment on AEMO's Wholesale Demand Response (WDR) Guideline issues paper (**Issues paper**).

The Issues paper sets out the information AEMO proposes to include in the WDR guideline in accordance with cl 3.10.1 of the NER, along with additional guidance for stakeholders. Over the previous months we have provided our feedback relating to the WDR guideline in the WDR Technical Working group along with engaging in WDR related working groups and AEMO forums. We would like to take this opportunity to commend AEMO's consultation with stakeholders on the assessment of the unique issues the WDR Mechanism presents.

We support the proposed guideline information AEMO has outlined in the Issues paper.

With regard to the additional information that may be included in the guideline, we agree with AEMO's proposed approach. In the interests of providing stakeholders with the information necessary for registration and classification of DR units as early as possible, we agree with AEMO's position of limiting the additional guideline information. In particular, we support the additional information regarding the potential impacts of aggregation on system security and the provision of dispatch data to DRSPs and retailers. Whilst ideally information relating to the baseline methodology metrics and AEMO compliance assessments should be included in the Guideline, given we expect this information will be available to stakeholders once finalised, the WDR guideline should not be delayed to accommodate this information.

We note the challenges AEMO has identified in the Issues paper regarding dispatch instruction information provided to the FRMP when the DUID is an aggregated unit. We support AEMO's approach of providing the relevant FRMP's NMIs that may have responded to meet the DUID dispatch instruction. This will provide retailers with a preliminary indicator of the NMIs subject to WDRM settlement process. Ultimately the Settlement reports will draw out the NMIs subject to the WDRM settlement based on a comprehensive assessment of the all NMIs metering data that form the aggregated DR unit.

If you have any queries about this submission, please contact Kyle Auret on (03) 8633 6854 or KAuret@agl.com.au.

Yours sincerely,

Chris Streets

Senior Manager Wholesale Markets Regulation