

Via email:

Wholesale demand response (WDR) guidelines

Dear AEMO,

Brickworks has the following comments on the Issues Paper for the WDR Guidelines consultation:

- 4.1 - a site should be capable of providing WDR based on the metering that currently exists at the site. We do not agree that 5 min metering must be installed in order for site to be eligible for WDR.
- 4.3 – the term “weaker area of the power system” does not appear to have any definition other than what AEMO deems it to be on any given day. This term should be clearly defined based on metrics or should be removed from the guidelines.
- 5 .1 – a site should be capable of providing WDR based on the metering that currently exists at the site. We do not agree that telemetry should be required in order to participate in WDR which imposes a significant cost on large users. The proposed 5MW threshold is too low. AEMO has provided no compelling evidence of why telemetry is required at large users sites in order to provide demand response. These sites may vary electricity consumption levels under business as normal use or shut down a plant for maintenance activities with no notice to AEMO currently. Unless the site is extremely large (>30MW), AEMO should account for the demand response volume via its load forecasting process.
- 5.2 - telemetry should not be required to be installed at large consumer sites. If it does apply and an exemption process exists, the exemption should be granted if the cost of the telemetry is unreasonable given the profitability of the business or prevents the large customer from participating in WDR.
- 6 – the baseline methodology should floor the volume at 0, such that a large customer can never provide a negative demand response (ie by failing to meet a dispatch target and the actual consumption being higher than the deemed volume).
- 6.2 – a request to change a baseline methodology should not result in an existing WDR participant from being unable to bid while waiting for AEMO to establish a new baseline methodology. No other market participant who is registered is taken out of the market to wait for AEMO to update standing data.
- 7 – AEMO should not be able to override the DUID level MRC, as this should default to the sum of the NMI level MRCs. It is not appropriate for AEMO to de-rate the MRC of WDR, which should be set based on the application of the DRSP.

Kind Regards,

Melissa Perrow

General Manager Energy

Brickworks Building Products

L9, 60 Carrington St

Sydney NSW 2000

www.brickworksbuildingproducts.com.au