



Part of Energy Queensland

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Ms Stephanie Jolly
Executive General Manager Consumers & Markets
Australian Energy Regulator
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Dear Ms Jolly

Draft Price-Responsive Reporting Guideline

Energex Limited (Energex) and Ergon Energy Corporation Limited (Ergon Energy Network), as distribution network service providers (DNSPs) operating in Queensland, welcome the opportunity to respond to the Australian Energy Regulator (AER) on the draft Price-Responsive Reporting Guideline (Guideline).

We acknowledge the importance of monitoring and reporting on the impacts of unscheduled price-responsive resources, particularly as the penetration of Consumer Energy Resources (CER) and other distributed technologies continues to grow. However, we wish to make the following observations.

We consider that the analysis proposed under this Guideline would be more appropriately incorporated into the annual Wholesale Electricity Market Performance Report, rather than published as a separate report. The creation of a standalone report risks implying that the impact of CER and other price-responsive resources is non-material to wholesale market performance. This perception is likely to be proven incorrect over time, as these resources increasingly influence market outcomes, including forecast deviations, dispatch efficiency, and ancillary service requirements.

Embedding this analysis within the existing annual market performance report would:

- provide a more integrated and comprehensive view of market dynamics
- avoid fragmentation of reporting, and
- better reflect the evolving significance of price-responsive resources in the National Electricity Market.

We have no objections to the scope of reporting elements outlined in the draft Guideline. The proposed analytical approaches, including the use of counterfactual spot price estimation and attribution of impacts on ancillary services and the Reliability and Emergency Reserve Trader, are appropriate.

Finally, we support the inclusion of the Price-Responsive Reporting Guideline as part of the Wholesale Market Monitoring and Reporting Guideline, consistent with the flexibility provided under the Integrating Price-Responsive Resources rule change. This approach would streamline regulatory reporting and align with the AER's broader market monitoring functions under the National Electricity Law.

Thank you for the opportunity to contribute to this consultation. Should the AER require additional information or wish to discuss any aspect of this submission, please contact either myself on 0429 394 855, or Charmain Martin on 0438 021 254.

Yours sincerely



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