



Enel X Australia Pty Ltd
Level 18, 535 Bourke Street
Melbourne, Victoria 3000
Australia
T +61-3-8643-5900
www.enelx.com/au/

Jacqui Thorpe
GM – Compliance and Enforcement
Australian Energy Regulator

Submitted by email: aer inquiry@aer.gov.au

22 April 2021

Dear Ms Thorpe

RE: Wholesale demand response participation guidelines – Issues paper

Thank you for the opportunity to provide feedback on the issues paper for the WDR participation guidelines.

Enel X operates Australia's largest virtual power plant.¹ We work with commercial and industrial energy users to develop demand-side flexibility and offer it into the NEM's energy and ancillary services markets, the RERT mechanism, and to network businesses.

The AER's proposed approach appears sensible and it is reasonable to expect DRSPs to record and retain information to demonstrate compliance with the various obligations of the mechanism.

Our only comment is that the guideline should not mandate the specific pieces of information that DRSPs must record and retain, particularly where that information is created and held by WDRU load customers. An example is the suggestion that DRSPs could retain and provide access to a WDRU's plant production and maintenance schedules to support an explanation of its WDR activity. While DRSPs might be provided with their customers' production and maintenance schedules, this may not always be the case and will depend on each customer's willingness and ability to share that level of detail with its DRSP. It is reasonable to expect DRSPs to retain this information if they have access to it, but it should not be requirement for customers to give access to it.

Other types of information that a DRSP could reasonably be expected to record and retain to explain its WDR activity include emails to/from customers, records of phone calls with customers, staff correspondence via DRSPs' internal systems, and correspondence with AEMO.

If you have any questions or would like to discuss this submission further, please do not hesitate to contact me.

Regards

Claire Richards
Manager, Industry Engagement and Regulatory Affairs



¹ Bloomberg NEF, December 2019.