

30 October 2023

Energy Policy WA
Level 1
66 St Georges Terrace
Perth WA 6000

Attn: Demand Side Response Working Group

Re: Review of DSR participation in the WEM

Newmont Boddington Goldmine (NBG) is one of the larger single point loads on the SWIS system and accounts for ~5% of the energy consumed across that system. NBG has for a number of years participated in the provision of Demand Side Management services through its support of the Bluewaters 1 DSP.

Newmont provides its view of the proposed changes to the DSP market rules below.

Proposal 1:

1. Do stakeholders support integrating constrained access loads in the WEM and the WEM Rules?

[Newmont agrees](#)

2. Are there any circumstances in which it would not be efficient or practical to integrate constrained access loads into the WEM Rules

[A minimum load size or aggregation size should be determined for inclusion](#)

Proposal 2:

3. Do stakeholders support providing clarity in the WEM Rules regarding the registration requirements applying to a hybrid facility comprising a load and an ESR component?

[Newmont supports providing this clarity.](#)

Proposal 3:

4. Do stakeholders support providing the option for hybrid facilities to install settlement grade sub-meters?

[Newmont supports providing an option](#)

Proposal 4:

5. Do stakeholders agree that an ex-ante 'X of Y' methodology incorporating a 'day of adjustment' is an appropriate baseline design for DSP participation?

Newmont agrees that an ex-ante “X of Y” methodology should be used with adjustments for periods when loads are reduced for maintenance or suspended operations differing from their normal operating levels.

Proposal 5:

6. Do stakeholders agree that the existing framework of the SRC mechanism already provides effective incentives for DSR participation?

Newmont agrees that the existing SRC framework is an effective mechanism to manage DSR participation. Newmont disagrees that the incentive is sufficient.

Proposal 6:

7. Do stakeholders support amending the Metering Code so Western Power must share data (which AEMO shall keep confidential) with AEMO upon request?

Newmont agrees

Proposal 7:

8. Do stakeholders agree that DSR should be allowed to directly participate in the STEM?

Newmont agrees

Proposal 8:

9. Do stakeholders agree that there is no need or benefit that would justify changes to DSP participation in the real time energy market?

Newmont agrees

Proposal 9:

10. Do stakeholders agree that the Real-Time Market has sufficient opportunity for DSR participation?

Newmont agrees

Proposal 10:

11. Do stakeholders agree that no changes should be made to introduce a minimum demand service at this time?

Newmont agrees

Proposal 11:

12. Do stakeholders agree that there may be potential barriers to the participation of DSR in the ESS markets?

Newmont agrees

13. Do stakeholders agree that the size and potential technical limitations (such as the telemetry requirements) for providing ESS should be re-examined?

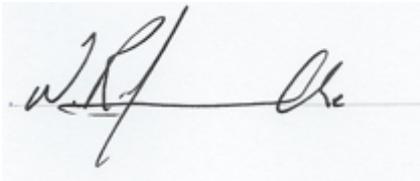
Newmont agrees

Proposal 12:

14. Do stakeholders agree that no changes are required to the ability of DSR to simultaneously participate as a DSP and as an Interruptible Load providing ESS?

Newmont as the sole participant in the Bluewaters Power 1 Pty Ltd DSP program has been concerned for some time that AEMO is not properly administering the WEM rules associated with DSP programs where historically it has allowed Intermittent Loads to provide Contingency Reserve Raise services only and have not been dispatching these as DSP in spite of issuing capacity credits to them. In these circumstances the DSP registered in this fashion escaped the requirements of the DSM rules as AEMO refused to dispatch these programs in rotation as required by the market rules. It is Newmont's position that the WEM Rules that provide for the rotation of DSPs that are dispatched by AEMO need to be enforced.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Trumble', is written over a horizontal line.

Wayne Trumble
Energy Manager