

Our ref: EDM 66341351
Contact: Matt Veryard (08) 9326 4898

2 November 2023

Ms Dora Guzeleva
Energy Policy WA
Level 1, 66 St Georges Terrace
Perth WA 6000

energymarkets@dmirs.wa.gov.au

Dear Dora

Consultation Paper: Demand Side Response Review

Western Power welcomes the opportunity to comment on the proposals presented in the Demand Side Response (DSR) Review Consultation Paper. These proposed changes aim to further facilitate the participation of DSR in the WEM.

Western Power supports the purpose of this review to ensure adequate incentives for DSR participation in the WEM and provides its comments as follows.

Comments on Proposal 1:

Western Power notes that it is required to share operationally relevant information with AEMO. As such, Western Power already provides AEMO with information on the transmission connected runback loads and the Eastern Goldfields Load Permissive Scheme (ELPS). This information includes curtailment triggers and mechanisms once triggered as part of Western Power's Operating Guidelines.

It should also be noted that constrained access connections are generally proposed by the parties seeking to connect to Western Power's network as a means of expediting the connection and/or avoiding the costs of network upgrades necessary to facilitate the connection. Curtailment triggers, in these instances, would reflect specific circumstances relevant to the size and location of the connecting load. Parties seeking to connect to Western Power's network on a constrained basis review all terms and conditions of their connection as part of the connection process.

Comments on Proposal 3:

Western Power notes that further consideration should be given to the practicalities of installing Western Power's revenue grade meters on individual components of hybrid facilities as sub-meters. This includes technical feasibility, operational complexities, and alignment to the existing national regulatory requirements. As the key stakeholder, Western Power requires and welcomes the opportunity to have direct input into the process.



363 Wellington Street Perth 6000
GPO Box L921 Perth WA 6842
westernpower.com.au



† 13 10 87
f (08) 9225 2660
TTY 1800 13 13 51
TIS 13 14 50

Electricity Networks Corporation
ABN: 18 540 492 861

Comments on Proposal 6:

Western Power is supportive of the intent to amend the *Electricity Industry (Metering) Code 2012* (Metering Code) to enable Western Power to share relevant metering data with AEMO upon request, to the extent necessary for market purposes, and with AEMO keeping that information confidential. However, implications of amending confidentiality obligations on contestable vs non-contestable customers need to be carefully examined.

When sharing customer data, Western Power is bound by its obligations under the Metering Code. The Metering Code currently limits Western Power's ability to provide AEMO with meter readings for some of the relevant NEMs to protect customer confidentiality. As such, there is a need to align requirements on Western Power to provide the information to AEMO. As the key stakeholder, Western Power requires and welcomes the opportunity to have direct input into the process.

Western Power welcomes the opportunity to further discuss the feedback. In the meantime, if you have any questions, please do not hesitate to contact Matt Veryard on (08) 9326 4898.

Yours sincerely

Zahra Jabiri

Head Of Regulation & Investment Assurance