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Samuel Martin
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

2 July 2019

Dear Mr. Martin

RE: Monitoring and reporting on frequency control framework, consultation paper

Thank you for the opportunity to provide feedback on the consultation paper for the *Monitoring and reporting on frequency control framework* rule change requests.

Enel X works with commercial and industrial energy users to develop demand-side flexibility and offer it into wholesale capacity, energy and ancillary services markets worldwide, as well as to network businesses. We have over 50 demand response programs in 12 countries, which involve altering customers' consumption patterns and controlling onsite generation. In the NEM, Enel X offers into the energy and FCAS markets, and has developed reserves for AEMO under the RERT framework, including through the ARENA/AEMO demand response trial.

Enel X is supportive of both rule change requests. As the AEMC notes in its consultation paper, regular and more detailed reporting of frequency control performance and FCAS market outcomes is likely to:

- ensure that anyone interested in, or affected by, the frequency control frameworks is able to easily access up-to-date data and analysis
- provide market participants with the information they need to make informed investment and operational decisions
- provide certainty to stakeholders regarding the ongoing availability of the reports, and what metrics will be reported on
- inform policy development
- provide valuable context for any actions undertaken to promote better frequency control performance.

Enel X agrees that the benefits of the two reporting obligations will outweigh the costs.

Enel X also agrees that the rule change requests are non-controversial, and therefore has no objection to them being considered under an expedited rule making process.

If you have any questions relating to this submission, please feel free to get in contact with me.

Regards

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