



26 September 2019

Australian Energy Market Commission PO Box A2449 Sydney South NSW 1235 Via https://www.aemc.gov.au/contact-us/lodge-submission GPO Box 643 Canberra ACT 2601 Tel: +61 2 9243 7773 ABN: 35 931 927 899 www.arena.gov.au

ARENA submission to Wholesale Demand Response Rule Change Draft Determination

ARENA has welcomed the opportunity to contribute to this Rule Change Process through previous consultation stages.

We attach a copy of the recently published report *Baselining the ARENA-AEMO Demand Response RERT Trial*¹. The report analyses the relative accuracy, bias and precision of the '10 of 10' baselining methodology used to predict the actual metered load for participants in the RERT Trial. The results of this analysis suggests that the '10 of 10' baseline methodology currently used in the RERT may be adequate for certain types of loads, particularly those of larger commercial and industrial customers whose energy consumption is relatively similar from day to day and not particularly weather sensitive. The 10 of 10 methodology has lower accuracy and precision for other load types.

Please contact Jon Sibley, Principal Policy Advisor (jon.sibley@arena.gov.au) if you would like to discuss any aspect of ARENA's submission.

Yours sincerely

Darren Miller Chief Executive Officer, ARENA

¹ <u>https://arena.gov.au/assets/2019/09/baselining-arena-aemo-demand-response-rert-trial.pdf</u>