

Rachel Thomas
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

11 September 2023

Re: ERC0352 – NATIONAL ELECTRICITY AMENDMENT (INTEGRATING PRICE-RESPONSIVE RESOURCES INTO THE NEM) RULE

Reposit Power Pty Ltd (Reposit) thanks the AEMC for the opportunity to contribute to the rule making process currently considering this proposal.

Reposit asserts that system service capacity (MW) from Consumer Energy Resources (CER) to equal of that from any other source where the requirements of the system service in question are met. These requirements include performance, correct participation in markets, metrology, scheduling, data provision, registration processes, AEMO systems and governance under the NER.

There is no reason for capacity from CER to be treated differently to any other source of capacity once the aggregation mechanisms have been executed. The aggregation mechanism needs be no more complex than the addition of metrology information from pre-registered devices meeting the existing standards of the market.

This capacity should earn the same money from the same service provision under the same NER framework. It should directly compete with all other sources of MW and be subject to the same conditions of service provision.

Specific to this rule change proposal, and consistent with the above, Reposit asserts that:

- Aggregated CER should be represented by a DUID
- A CER DUID of more than 5MW should be scheduled and participate in dispatch processes – including making 5-min offers
- A CER DUID should be subject to an identical payment and penalty regime
- CER should provide SCADA data to AEMO in accordance with the functional specification applied to existing DUIDs/stations (and not through AEMO mandated or provided equipment)
- There is no alternative market for CER resources.

Reposit suggests that CER with common Market Participant representation in a market, that acts in a correlated way when considered against price movements in a market, is operating as a DUID and should be registered where it is above 5MW.

CER correlations can be detected by considering the MSATS data during the most recent extreme price events in market. The set of correlated NMIs can then be presented by AEMO for discussion and eventual registration to the Market Participant.

In this way registration complexity and cost for a Market Participant can be reduced, and AEMO is able to increase the accuracy of the demand forecast for an interval of extreme market prices.

Continued Engagement

Reposit would welcome the opportunity to more fully discuss this rule change proposal with the AEMC and other stakeholders.

Kind Regards

A handwritten signature in black ink, appearing to read 'D. Spaccavento', with a long horizontal stroke extending to the right.

Dean Spaccavento
CEO