



Ref. A5824088

24 April 2025

Harrison Gibbs
Project Leader
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Sent via online submission.

Dear Mr Gibbs,

Review of the Wholesale Demand Response Mechanism EPR0099

Powerlink Queensland (Powerlink) welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC's) Wholesale Demand Response Mechanism (WDRM) Review. We find the review timely given the recent finalisation of the Integrating Price Responsive Resources into the NEM (IPRR) rule change.

Overall, Powerlink considers that higher participation of the demand-side in market dispatch, scheduling and electricity price formation will deliver a more cost effective and equitable energy transition. We are supportive of the activities and mechanisms incentivising visibility and availability of demand side resources in a way that facilitates their active participation in energy and ancillary services, and will ultimately lead to better outcomes for consumers.

Powerlink believes incentivising and facilitating the integration of flexible demand-side resources into market dispatch, through mechanisms such as WDRM or IPRR, can offer many customer and system benefits not captured by other market mechanisms.

Network security and reliability support

Increasing visibility and dispatch of load provides opportunities for network service providers (NSPs) to work with customers on further network security and reliability support. Demand-side energy dispatch alongside network services can support the recovery from network disruptions and may provide additional opportunities to mitigate impacts from extreme weather events and other emergencies.

Optimising network utilisation

With registered flexibility, network utilisation can be better optimised and result in minimising network augmentation expenditure. This will limit the transmission impact on the energy price, resulting in reduced energy costs for consumers.

Demand event risk mitigation

Demand response helps mitigate the impact of very high and very low demand events via appropriate dispatch and price signalling directly to customers. This reduces the risk of outages and ensures a more consistent demand event response.

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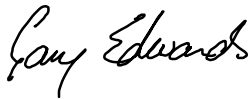
Empowering consumers

Creating mechanisms that incentivise the integration of flexible demand-side resources into market dispatch gives consumers more control over their energy use and can further promote better customer energy literacy and awareness. It allows them to manage their energy costs more directly and efficiently, effectively controlling exposure to spot prices as part of the dispatch and bidding process. In addition, they gain more direct access to opportunities in markets for energy and ancillary services, potentially further reducing energy expenses.

The WDRM offers key benefits through the registration and classification of large loads. We consider that customers, networks and the market will benefit from the adoption of this or other mechanisms including the voluntary scheduled resources created by the IPRR Rule. This will facilitate a wider range of resources visible to, or scheduled by, the dispatch process. This may further support the secure operation of the network through the energy transition and beyond.

Powerlink welcomes the opportunity to continue working collaboratively with AEMC and other stakeholders on maximising the participation of demand side resources in the market and ensuring they provide network value, ultimately benefiting consumers. If you have any questions regarding this submission or would like to meet with Powerlink to discuss this matter further, please contact Jennifer Harris (General Manager, Network Regulation) on 0407 125 515 or email jenny.harris@powerlink.com.au.

Yours sincerely,



Gary Edwards
CHIEF OPERATING OFFICER