

13 February 2015

Tom Walker
Australian Energy Markets Commission
PO Box A2449
Sydney South NSW 1235
Submitted via AEMC website – ERC0174

Dear Tom,

Thank you for the opportunity to respond to the draft rule determination on Improving Demand Side Participation Information provided to AEMO by Registered Participants (the Draft Decision).

As indicated in our response to the earlier consultation paper, Stanwell supports the intention of the recommendations in the Power of Choice review *“to better enable AEMO to perform its responsibilities with respect to electricity demand forecasting and, therefore, potentially enhance the quality of decision making which is informed by those forecasts”*¹

We do not consider the modifications proposed in the Draft Decision to materially affect the rule change proposal. While we support efforts to improve the transparency of the non-scheduled sector, we believe that the specific rule proposed is poorly targeted.

We repeat our previous view that the proposed rule change (and more preferable rule change) is likely to entail significant administrative and compliance costs for registered participants, disproportionate to the possible benefits arising from the provision of such information.

We support Energy Australia’s suggestions in response to the consultation paper, targeted at improving the existing survey to decrease administrative burden on registered participants who would otherwise provide information.

Thank you for your consideration of Stanwell’s response to the Draft Decision. If you would like to discuss any aspect of this submission, please contact me on 07 3228 4529.

Regards



Luke Van Boeckel
Manager Regulatory Strategy
Energy Trading and Commercial Strategy

¹ Consultation paper, page 3