

While the proposed changes will lead to increased costs of aggregating DSM resources and some of the smaller resources will no longer be cost effective, we accept the proposed changes will add value to DSM contribution to the security of the SWIS grid.

2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.

We note the Rule Change contains seven issues of change:

- 1) relaxed fuel requirements for generators;
- 2) revised DSM availability requirements, including the linking of the refund formula to the Refund Table and the issue of Dispatch Advisories;
- 3) real time telemetry
- 4) abolishing the 3rd day exemption;
- 5) changing the criteria for the non-balancing merit order;
- 6) dispatch of DSP's outside nominated availability;
- 7) capping the DSM at the IRCR

Amanda Australia supports all seven issues as a package.

Issue 1 does not affect Amanda Australia as a DSM aggregator but we support this change in

Clearly, Issue 7 has been included to avoid gaming by some participants. As such Amanda Australia supports the concept but feels more analysis is required to ensure a fairer measure is