



Wholesale Electricity Market Submission to Rule Change Proposal

RC_2013_10 Harmonisation of Supply-Side and Demand-Side Capacity Resources

Submitted by

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Date submitted:	2 October 2013

Submission

Submissions for Rule Changes should be submitted to:

Independent Market Operator

Attn: Group Manager, Development and Capacity

PO Box 7096

Cloisters Square, Perth, WA 6850

Fax: (08) 9254 4399

Email: market.development@imowa.com.au

- Please provide your views on the proposal, including any objections or suggested revisions.**

EnerNOC supports Demand Side Management (DSM) resources being treated as the functional equivalent of peaking resources within the Western Australian and other capacity

DSM providers and DSP operators will incur costs implementing the telemetry requirements introduced in Issue 3. It is difficult to estimate these costs without a full appreciation of the details of the obligations and technical requirements, which will be specified in the Power System Operating Procedures.

Issue 7 will result in an artificial limit on the ability of customers to receive value for the full amount of load reduction capability they are capable of providing, to the detriment of both participants and the system operator. However, other changes that were contemplated would have had even worse effects. We are, therefore, able to accept the proposed change as a compromise that will preserve much of the efficacy of the program, albeit with significantly greater effort on the part of DSP operators such as EnerNOC.

4. Please indicate the time required for your organisation to implement the