



2011-02-01

Dr. Troy Forward
General Manager, Development
Independent Market Operator
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Cloisters Square, Perth WA 6850

Sent by email to market.development@imowa.com.au

Re: Change Proposal No: RC_2010_29

Dear Troy,

proposed rule change number RC_2010_29.

It brings greater clarity to how DSM aggregators gain access to NDLS, and therefore will promote new entrants and as a consequence greater competition

It avoids discrimination against DSM aggregators at the connection point

It encourages more DSM to be made available, which will help end users manage their energy better.

There are expected to be no cost impacts for Energy Response from the implementation of this rule change and we expect only positive outcomes for DSR aggregation.

Issue 2: Facility Definition

Our overall comment on this issue is supportive: moving from registration of individual NMIs to an aggregated block (or DSP) approach is an efficient and logical outcome, and is evidence of progress to more closely align the Rules to the Market Objectives. Managing, monitoring and measuring each

Energy Response wishes to acknowledge the work undertaken by the IMO in putting this proposed rule change together. This is a complex rule change and it is evident that there has been a good deal of forethought and detailed restructuring of the rules undertaken. We wish to reiterate that as an overall comment these changes are positive for DSM and the market as a whole. We also acknowledge that these changes will impact DSM aggregators and