

INTERNAL



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Energy Policy WA
Department of Mines, Industry Regulation and Safety
Submitted by email: energymarkets@dmirs.wa.gov.au
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Dear Energy Policy WA

Thank you for the opportunity to provide feedback on the
consultation paper

- Enel X supports baselines that are determined on a dynamic basis because they take into account actual demand, and so allow the baseline to increase or decrease depending on actual demand. As such, they provide a much more accurate reflection of counterfactual demand when dispatched.

to T-1). The RERT mechanism uses the same window (T-4 to T-1). In the WEM, the SRC mechanism also uses a T-4 to T-1 adjustment window for demand side resources.

For demand side programmes in the RCM, where there is a two-hour notice of dispatch, we propose that the adjustment window be a two-hour window ending at the dispatch notification (i.e. T-4 to T-2). Under such an approach there is very little incentive to game, because a customer would have to increase its demand across the whole adjustment window, at considerable cost, with no guarantee that it will be dispatched.

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