Issues with demand-side participation in the NEM

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Presented to AEMC DSP3 review stakeholder reference group

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facilitating a more sustainable future



I was asked to talk about the problems, not about possible solutions



Energy Response's perspective

- Independent demand-side aggregator
- 227 MW under long-term management
- Typical loads between 50 kW and 30 MW
- Five products:
 - Reserve capacity
 - Frequency control
 - Price-responsive generation
 - Price-responsive load
 - Network support

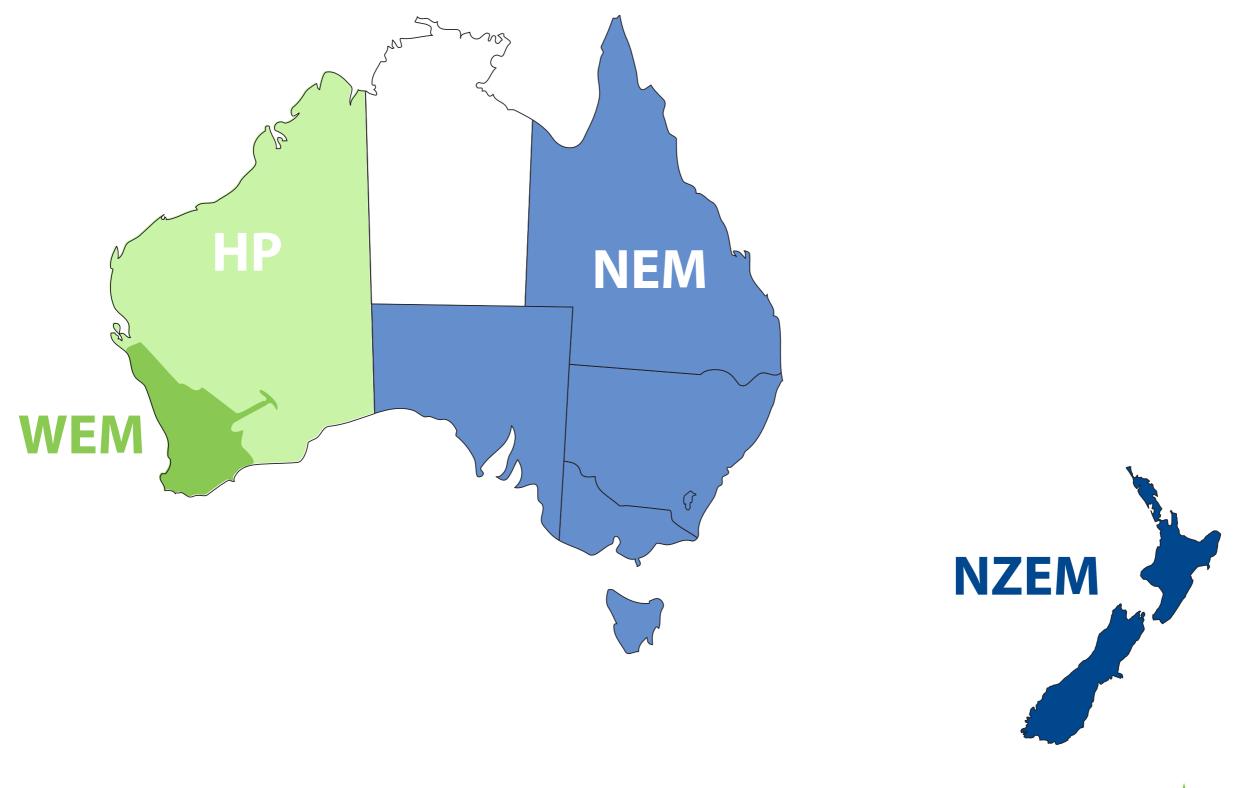


Demand response done properly

- Comes in many forms, even from one site
 - Different lead times (0.1 seconds to 1 day)
 - Different durations (1 minute to 8 hours)
 - Different marginal costs (\$0 to \$20,000/MWh)
- Extremely reliable in aggregate
- Costs money to make available
- Needs long-term contracts to be attractive



Four very different markets





Are we serious this time, rather than just going through the motions again?



Are we serious this time, rather than just going through the motions again?

I'm assuming that we are.



What problem are we trying to solve?



1999-2000	
2000-2001	
2001-2002	
2002-2003	
2003-2004	
2004-2005	
2005-2006	
2006-2007	
2007-2008	
2008-2009	
2009-2010	
2010-2011	 ſ

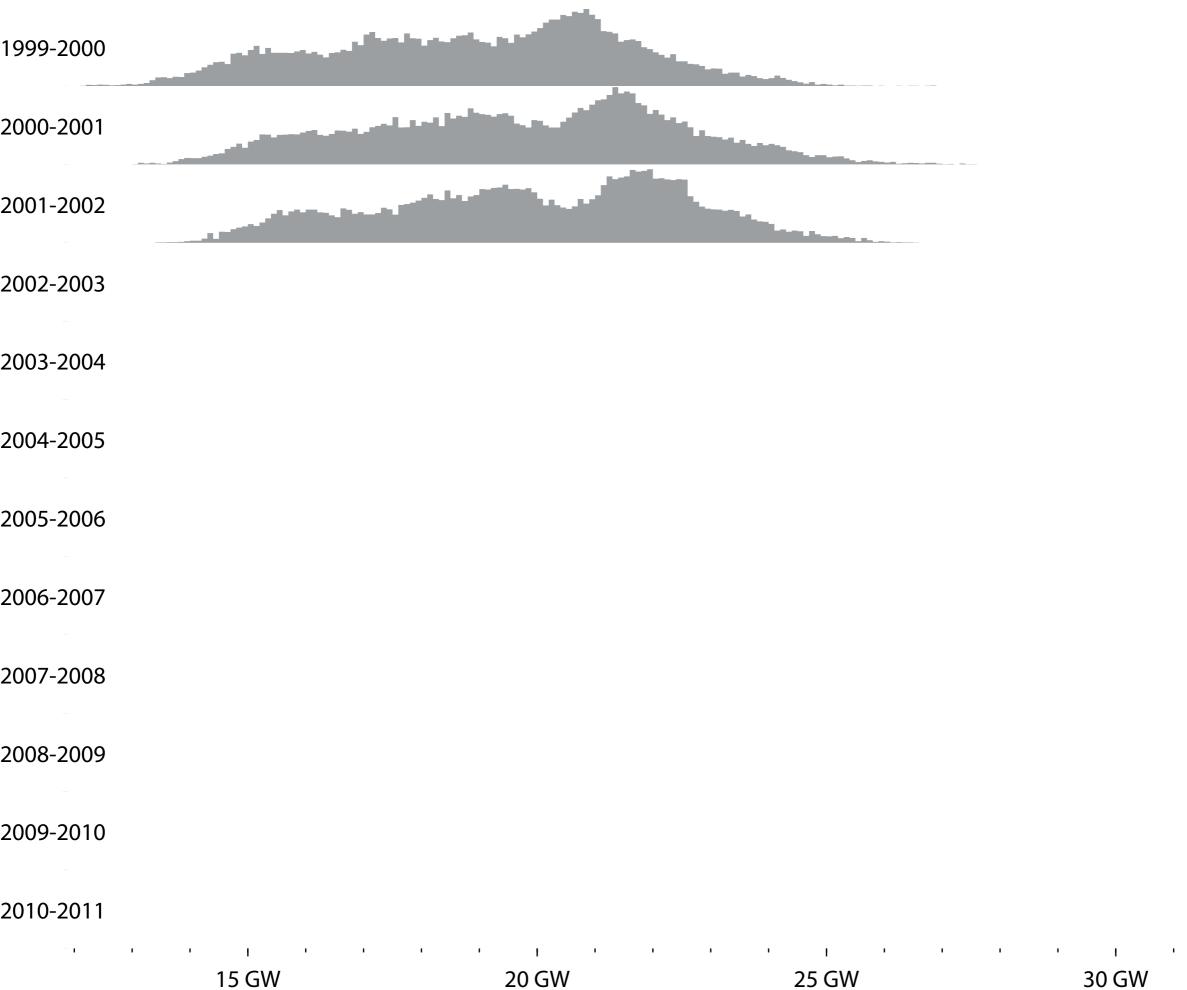
15 GW20 GW25 GW30 GWData: AEMO. Years to 31 May, excluding Tasmania.NEM demand30 GW

1999-2000						
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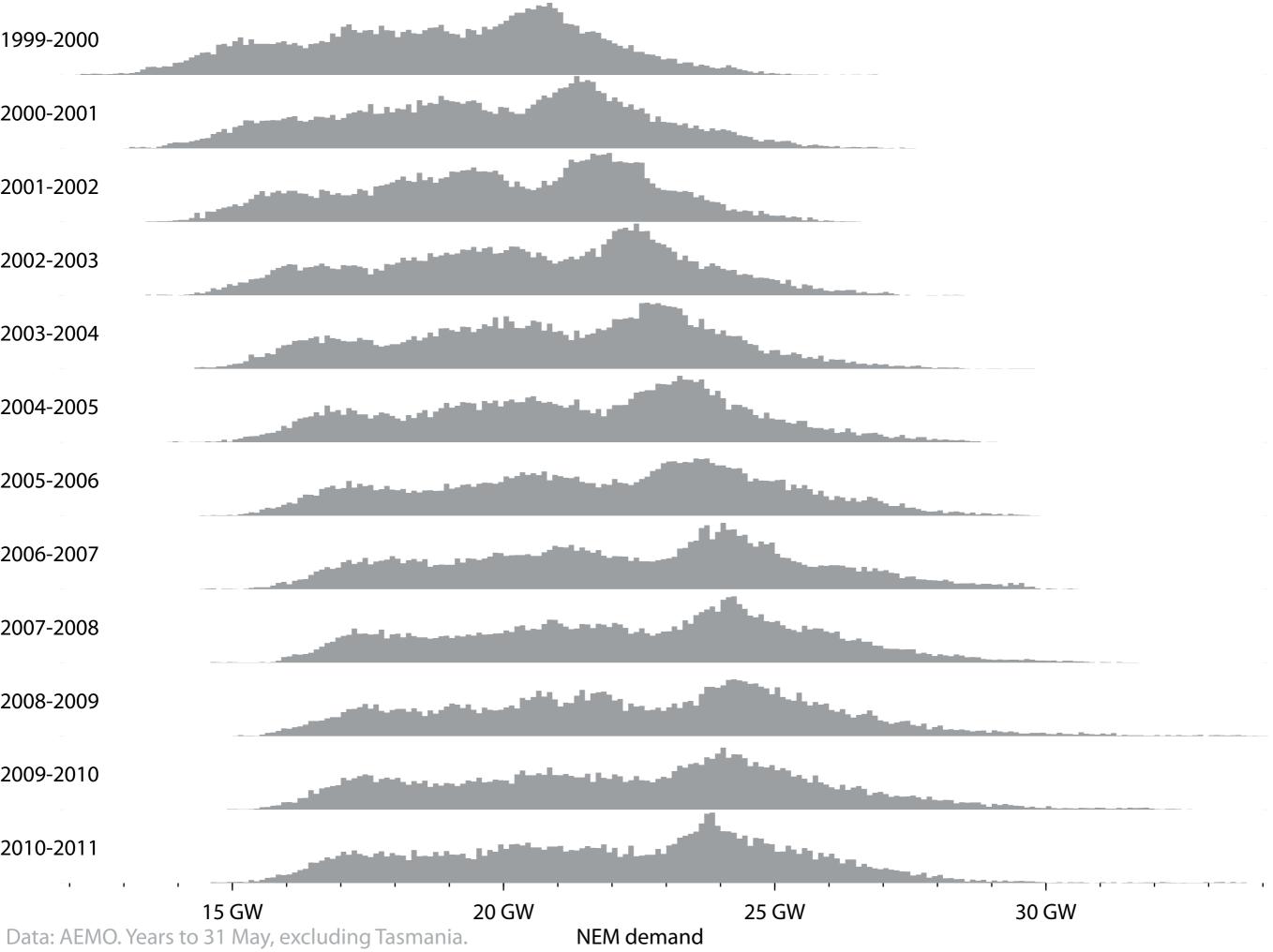
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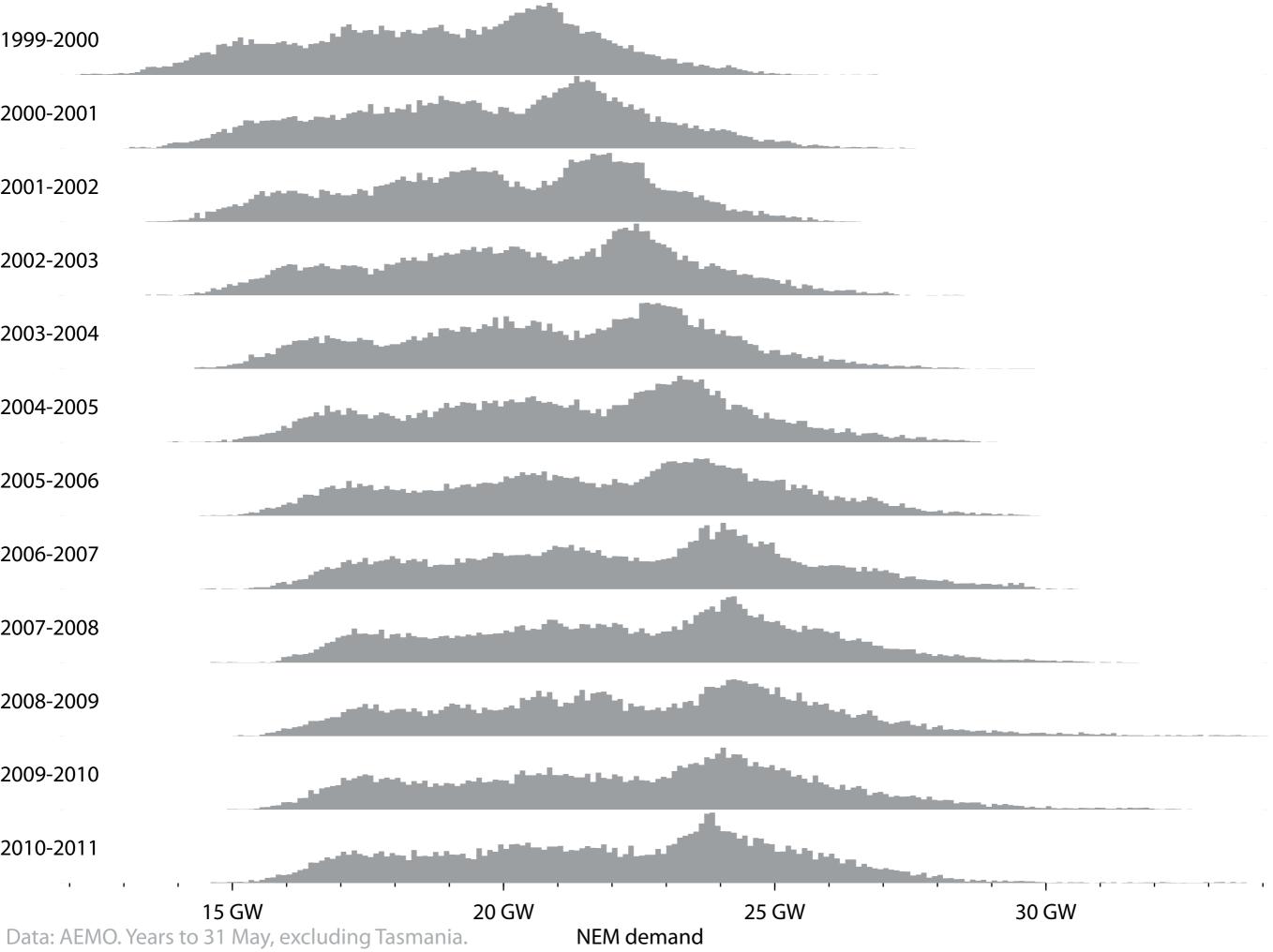
NEM demand

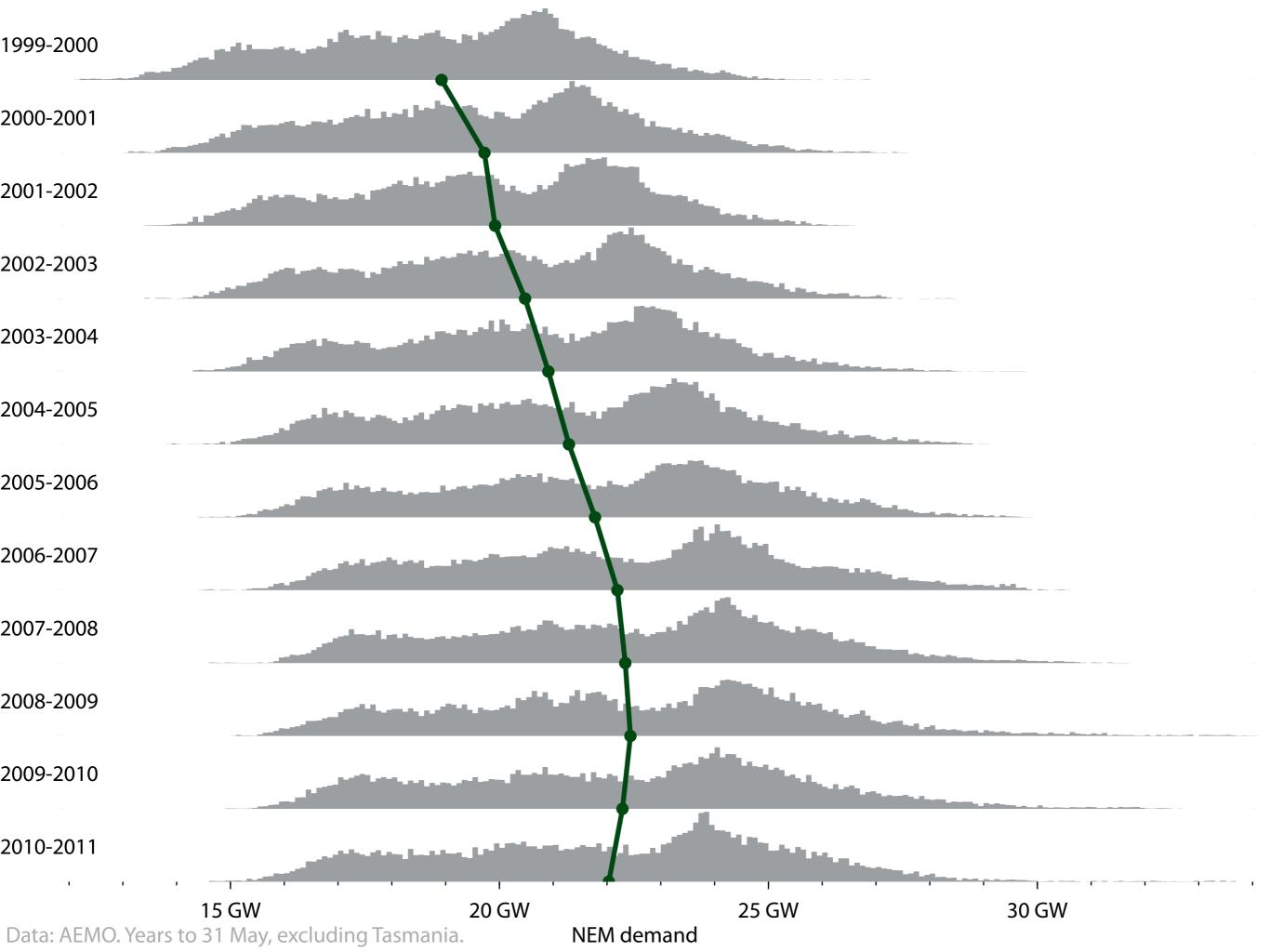
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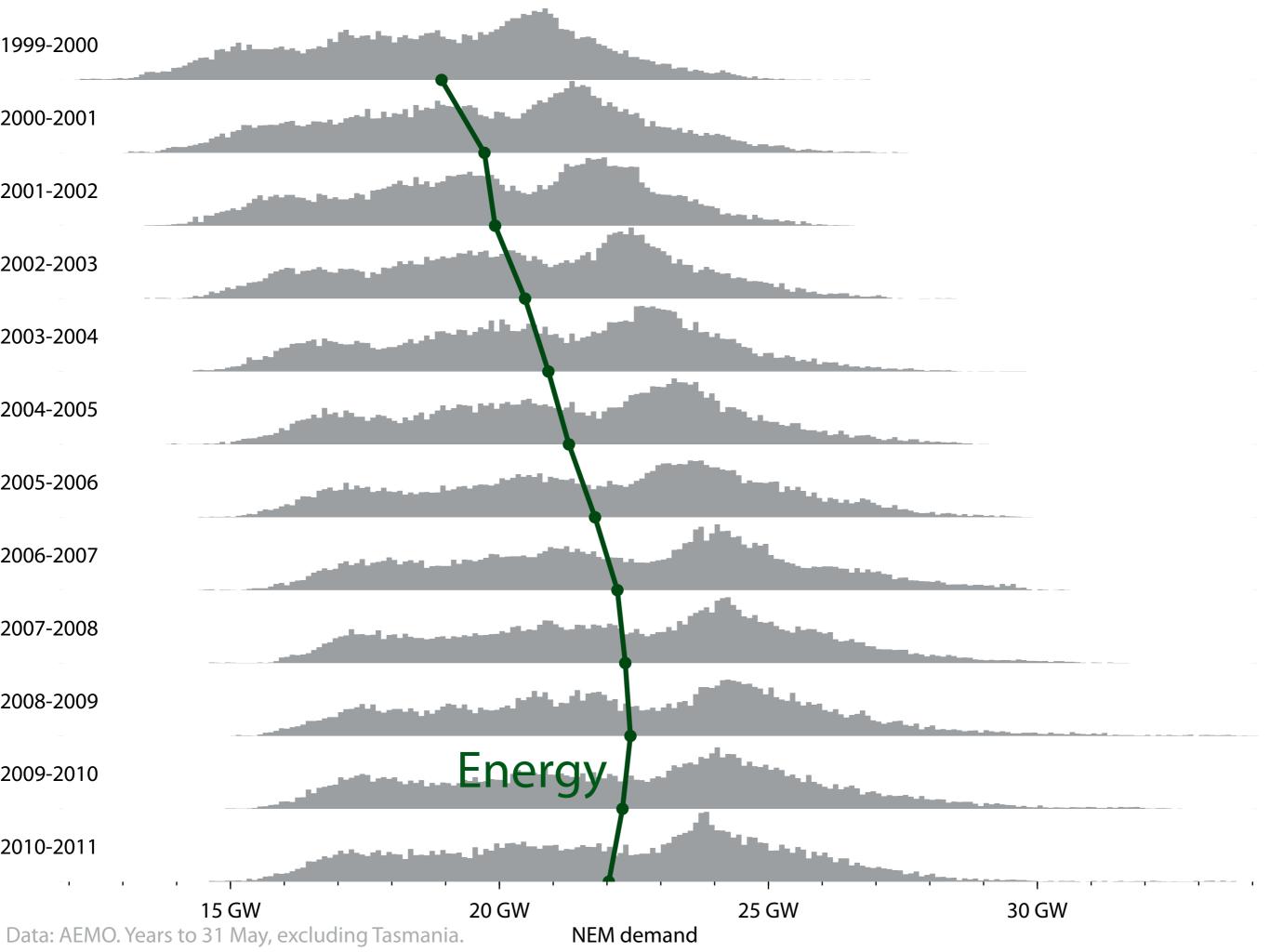


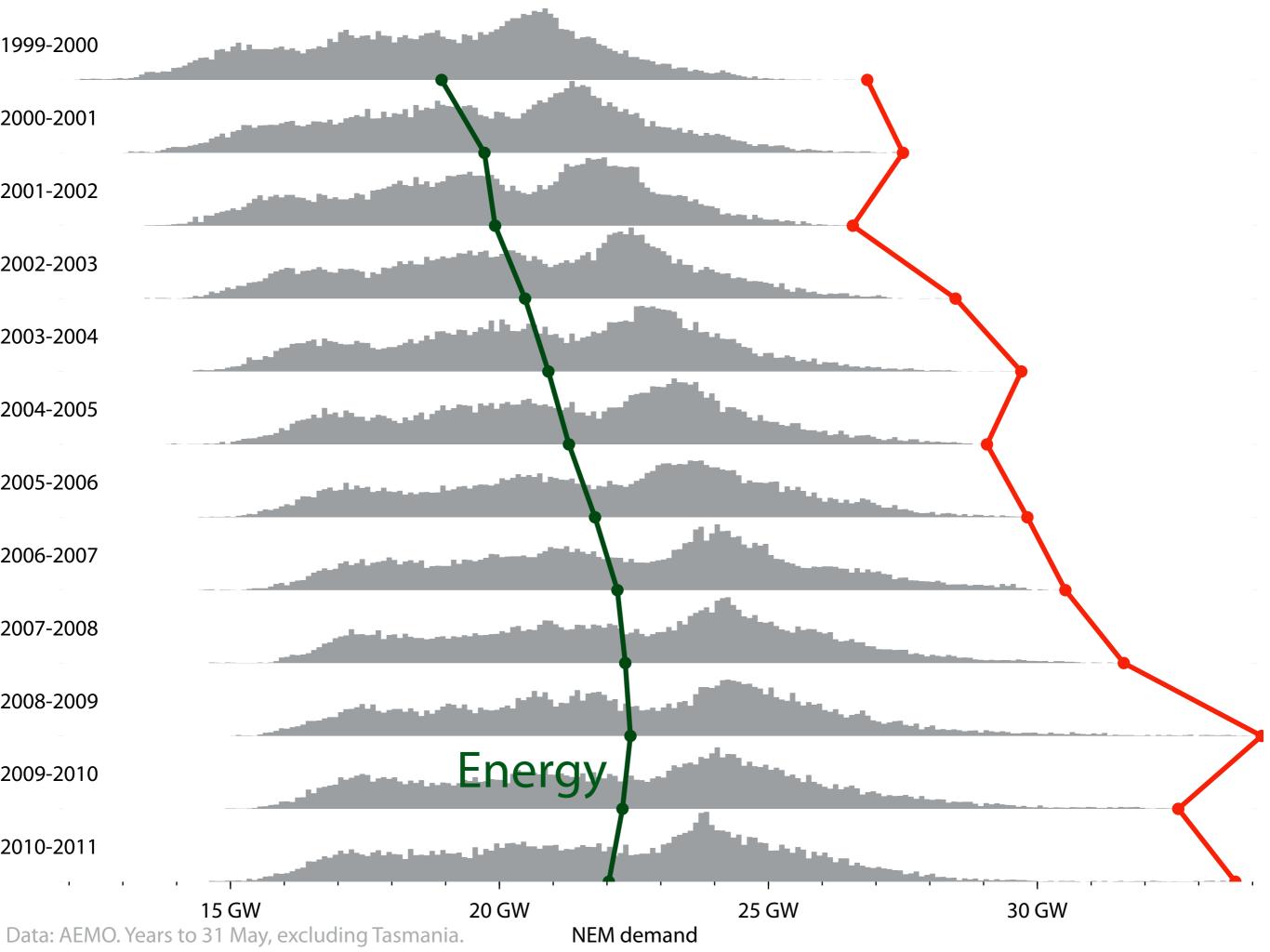
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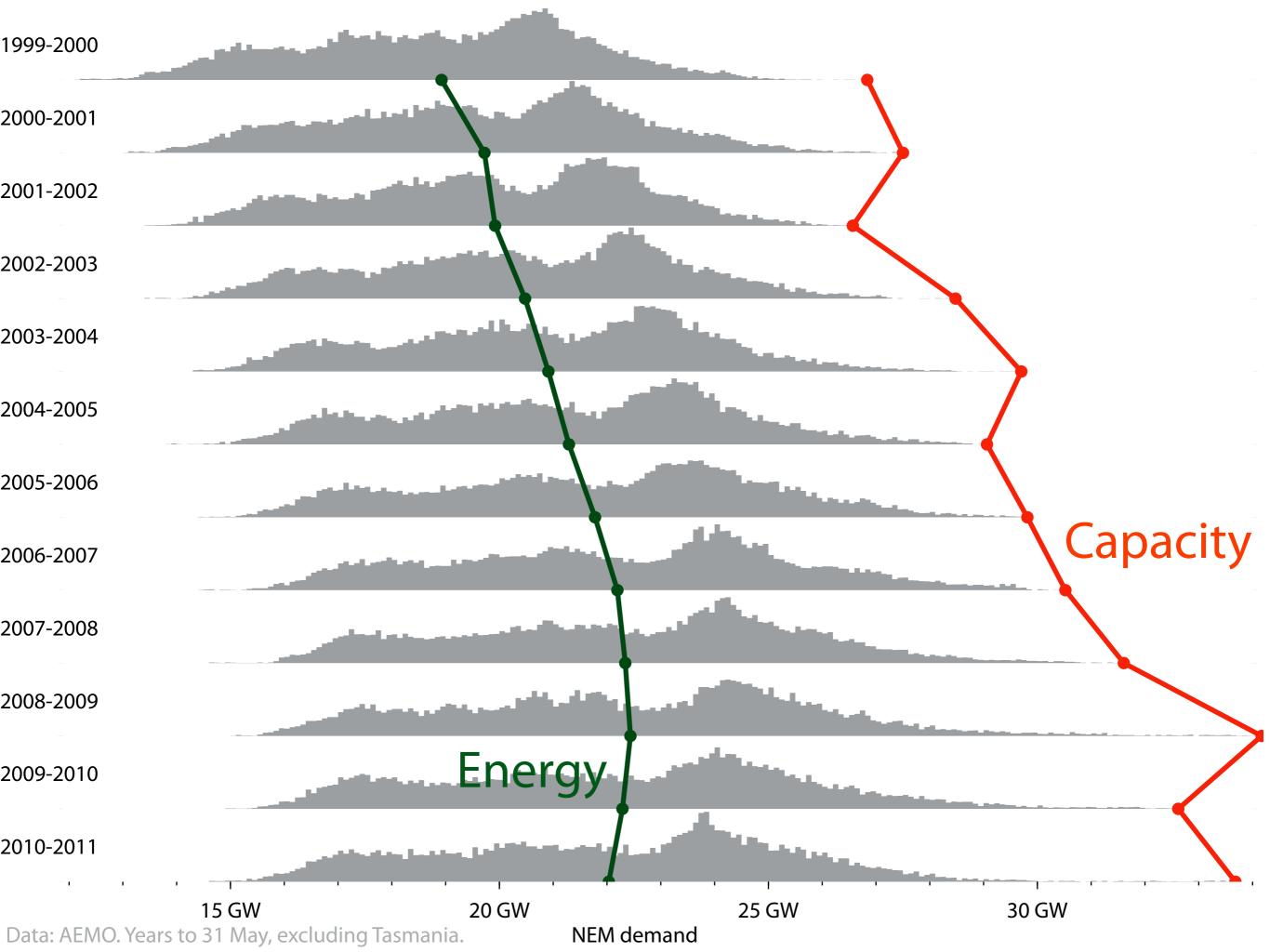


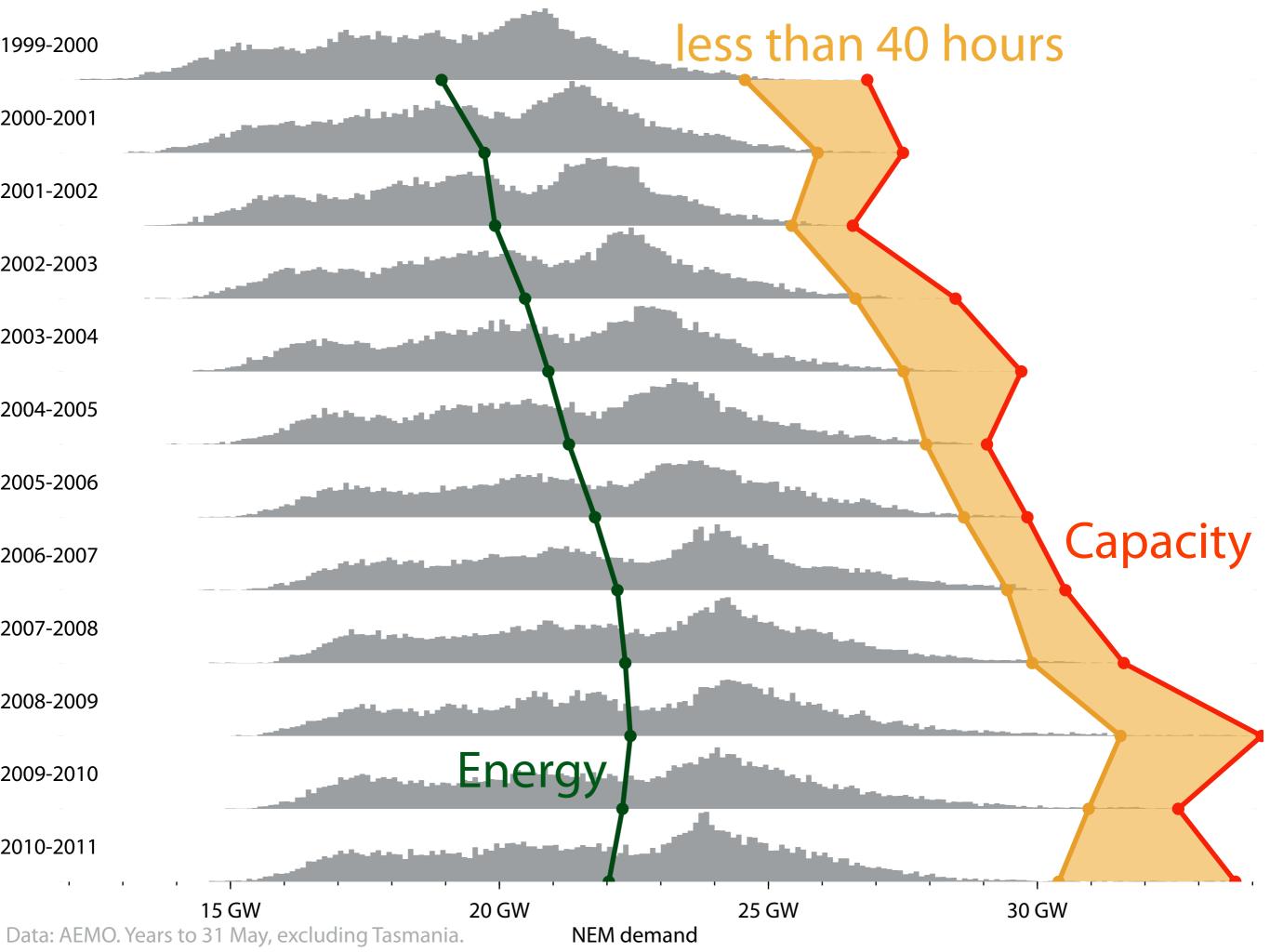












Effective price signals



Energy prices are not good capacity signals

- The two are only equivalent for participants who:
 - Have very deep pockets, or
 - Can use derivatives to hedge their positions



Energy prices are not good capacity signals

- The two are only equivalent for participants who:
 - Have very deep pockets, or
 - Can use derivatives to hedge their positions
- This covers the supply side, but not consumers
- To consumers, extreme spot prices seem punitive
- Hence consumers insulated by retailers
- No effective price signal reaches consumers
- Consumers will always make this choice



Choice



Price-responsive DSP is not portable

- At present, only a consumer's retailer benefits from price-responsive load reductions
- Hence, a consumer can only sell their DSP to:
 - Their retailer
 - A subcontractor to their retailer
- They have no other choices



Gentailers may not be keen on DSP

"We may be interested in paying you **not** to use it."

"We'd sue anyone who tried that with our customers."



Forced bundling prevents competition

- Price is everything
- It's very unlikely that consumers will choose retailers on the basis of their DSP schemes
- Hence no pressure on retailers to take DSP seriously
- For competition to develop over DSP, it must be separable from retail supply



Implementation details matter

Rules give consumers the right to access their meter data

BUT

- They have to go through their retailer
- No delivery mechanism is specified
- Neither is a timeframe for a response



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⇒ Retailer becomes gatekeeper



Reserves management



AEMO's reserves management tools

- Communications
 - ESOO, PASA, LRC, LOR forecasts, etc
- Directions
- Blackouts



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AEMO's reserves management tools

- Communications
 - ESOO, PASA, LRC, LOR forecasts, etc
- Standing reserve
- Directions
- Blackouts



Summary

- DSP is an efficient way to tackle capacity problems
- Need to redesign reserves management processes to find the best places for DSP
- Spot prices can't give capacity signals to consumers
- DSP services are distinctly different to network services or retail supply
- Forced bundling must be avoided
- Practical open access is important



Extra material



Price distortions

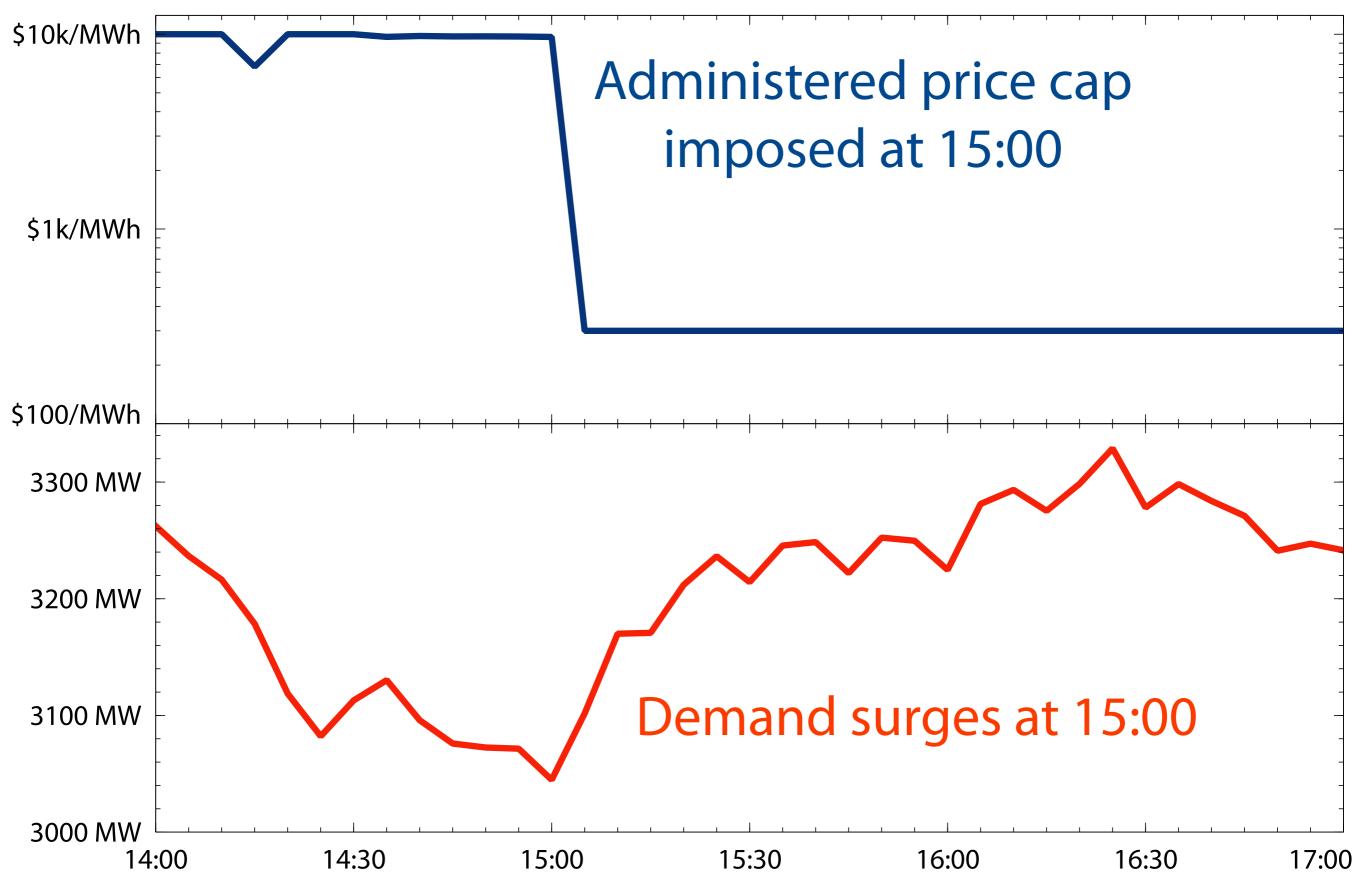


30 minute trading prices are too coarse

- Demand can respond more quickly than supply
- With 30 minute pricing, there's no reward for agility
- Ex-post pricing introduces unhedgeable risks
- IT systems have improved since market start; surely we can cope with 5 minute prices now?



Cumulative Price Threshold: SA, 29 Jan 2009



Duration



Duration is important

- Limited by
 - Retail churn
 - Short-duration network support requirements
- Short duration schemes tend to
 - Cost more
 - Be less reliable
 - Elicit less capacity from a given area

