

Consumer and Community Reference Group (CCRG) submission to AEMO's proposed draft Market Visibility Framework for price responsive resources consultation

October 2026

Two representatives of AEMO's Consumer and Community Reference Group (CCRG) – Douglas McCloskey and Mark Grenning – participated in the Market Visibility Framework (MVF) for price responsive resources consultation as members of AEMO's MVF Stakeholder Advisory Group.

Their focus was on consumer facing issues and interests, such as how best to realise value for consumers from improved visibility, as well as helping to define consumer benefits in relation to the MVF framework and implementation pathways. They had previously advocated for the development of a consumer narrative underpinning the MVF. While they agreed more visibility is expected to benefit consumers (for example through more confidence on system security and reliability), there was a question of how to meaningfully measure these benefits in advance and give consumers confidence that there will be net benefits once implementation costs are considered.

They met with representatives of AEMO on 6 October 2026 to provide a verbal submission on the drafted MVF and consultation paper.

Key points discussed and agreed included:

- Support for AEMO's consideration of consumer perspectives and providing clear explanations of what the MVF means for consumers. In particular, the CCRG supported AEMO's proposed staged implementation pathway as a means of testing and verifying benefits and the need for obligations as market conditions and the impact of parallel reforms play out.
- AEMO's proposed approach to managing the uncertainty around costs and benefits was noted. The CCRG supported building an evidence base over time and evaluating it through stage gates to determine that (1) forecasting accuracy and consumer outcomes could be achieved and (2) adverse market outcomes were occurring and attributable to unscheduled price responsive resources.
- The consultation process for the MVF was well delivered and effective and could be used as a model for other AEMO consumer engagements on complex operational issues. It was noted the consultation paper demonstrated AEMO had integrated stakeholder feedback and consumer perspectives throughout the process to prepare the draft MVF. In particular, Chapter 7 of the consultation paper being explicit regarding the limited value (at this stage) of a point in time cost-benefit analysis, detailing AEMO's approach to managing uncertainty and building an evidence base before implementation, and the value of historical evidence to illustrate consumer impacts.
- The MVF should function as complimentary to the Wholesale Demand Response (WDR) and other market mechanisms. An explicit priority in developing the maturity of the MVF should be informing and enabling those mechanisms to be more effective and realise more benefits for consumers.

- AEMO needs to ensure an appropriate implementation pace and certainty in findings to progress through the proposed implementation stages for the framework. The framework should be suitably adaptable to be able to effectively address or seek alternative solutions if certain behaviours become too complex or costly for the system to manage.
- Broader work is still required across the energy sector to improve the value proposition and pathways for consumers and their resources to be actively coordinated in a manner that delivers net benefits to the system and consumers.
- Effective mechanisms are required to ensure appropriate compliance and accuracy regarding the provision of visibility information under the framework.