

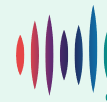
A large, abstract graphic on the right side of the page, consisting of a large, curved, teal-colored shape that resembles a stylized 'C' or a swoosh, with a thin green line curving around it.

On the Market Visibility Framework for Price Responsive Resources

Submission to the Australian Energy Market
Operator Draft Policy Framework

Submitted by: Benjamin Willey

DATE: 13/10/2026



Feedback on the AEMO draft policy framework: A market visibility framework for price responsive resources

Thank you for the opportunity to provide feedback on the consultation paper *A market visibility framework for price responsive resources*.

Energy Consumers Australia (ECA) supports AEMO's staged and proportionate approach to improving visibility of price responsive resources.

We have previously advocated for better integration of consumer energy resources and other flexible resources into planning processes such as the ISP.¹ Improved visibility has the potential to improve forecast accuracy and allow AEMO to better understand the behaviour of such resources so they can be more accurately valued and compared to traditional, grid-scale generation. This becomes increasingly important as the role of such consumer-owned resources grows.

We view improved visibility primarily as a way of achieving better consumer outcomes, rather than an aim in itself. These outcomes include:

- Lower consumer bills when improved visibility reduces avoidable system costs.
- Improved reliability.
- More efficient investment in the NEM.
- Better recognition of the value of flexible consumer resources.

Additional obligations should only be introduced only where there is a high probability that the benefits to consumers will outweigh the costs.

An appropriate framework should:

Support long-term planning and accurate valuation of price responsive resources

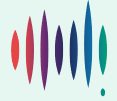
ECA have consistently advocated for a symmetric treatment of supply and demand-side resources when planning the future of the NEM through the ISP.²

As the energy system becomes increasingly distributed, it is important that planning frameworks accurately reflect the contribution that flexible consumer resources can make to reliability, system security and meeting future energy needs. Improved visibility of price responsive resources can support this by providing a better understanding of how these resources operate and how they can contribute under different market conditions.

This improved understanding can support more accurate modelling and valuation of flexible resources, helping ensure that investment decisions reflect the full range of options available to the system.

¹ ECA, *Submission to AEMC Review of the Integrated System Plan Framework*, 2026

² ECA, *A Generalised Framework for Valuing Electricity System Resources*, 2026



Demonstrate the consumer benefit gained from additional visibility

AEMO has identified potential ways in which improved visibility could benefit consumers and produced two case studies illustrating how improved forecasting of price responsive behaviour might have had a material impact on wholesale prices.

However, the link between improved forecast accuracy and benefits for consumers remains preliminary.

As part of the first phase outlined in the framework, AEMO should continue to develop its evidence base for the visibility requirements by demonstrating:

- How large the current visibility problem is.
- The expected improvement to forecasting accuracy once visibility is increased.
- How these improvements will translate into improved outcomes for consumers.
- How these benefits compare with the costs imposed by additional visibility obligations.

Ensure obligations are proportionate and independently verifiable

ECA supports AEMO's division of visibility requirements into different **modes**.³ Movement between modes should be based on clear criteria taking into account:

- How large the resource is.
- How predictable the resource behaviour is.
- The operational impact of the resource.
- Whether the expected consumer benefits of changing the mode exceed the consumer costs.

The criteria should allow an independent third party to be able to determine the applicable mode for a defined resource.

AEMO should explain how resources will initially be classified before they have become subject to the obligations associated with a higher visibility mode. The final framework should seek to avoid the paradoxical situation where additional data is required from a resource in order to determine whether that data is required.

Avoid undermining consumer participation in VPPs

Consumer participation in Virtual Power Plants (VPPs) has the potential to deliver significant value to the NEM.⁴ Any additional obligations placed on VPPs should therefore be carefully designed to avoid unnecessary increases in costs that could discourage consumer participation. Similarly, changes to VPP obligations should not reduce the availability, accessibility, or benefits of VPPs for consumers.

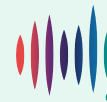
Protect consumer privacy and minimise data requirements

Our understanding is that the minimum data necessary to achieve the objective of materially improving forecasts would be collected.

However, increasing visibility will necessarily involve a transfer of privately held information from at least some price responsive resources. The privacy implication of this transfer will depend greatly on the level of aggregation applied.

³ AEMO, A market visibility framework for price responsive resources, September 2026

⁴ AEMO, 2026 Integrated System Plan, 2026.



To ensure visibility obligations are proportionate, the framework should therefore:

- Using aggregated data wherever possible.
- Collect data at the minimum frequency required.
- Collect data at the minimum level of granularity required.
- Avoid collecting individual consumer data.

In summary, the success of the proposed framework should be assessed by whether it can deliver better outcomes for consumers rather than simply increasing visibility or decreasing forecasting error.

We appreciate AEMO's consideration of these views.

Yours sincerely

A handwritten signature in black ink that reads "Ben Willey".

Benjamin Willey
Manager, Analytics and Advocacy

**The national voice for residential and
small business energy consumers**



PO Box A989,
Sydney South NSW 1235
T 02 9220 5500

energyconsumersaustralia.com.au