20 June 2008

Dr John Tamblyn
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Sent by email to: submissions@aemc.gov.au

Dear John

Australian Energy Market Commission
Review of Demand-Side Participation in the National Electricity Market
Stage 2: Issues Paper

Thank you for the opportunity for Energy Response to make an ongoing contribution to this critically important Review. We believe that the outcomes of this Review are not only critical for the NEM but for Australia as a whole.

We have structured our comments on the Stage 2 Issues Paper into the five topic areas in line with the structure of the Paper. Where we have been able we have also tried to provide solution-oriented information. The consideration of whether each of these suggested solutions would be "simple low cost" or "complex high cost" to implement or somewhere in between needs discussion, perhaps by the Reference Group.

Our comments are aimed at encouraging actions by electricity end users so they can commercially contribute with demand side responses to improving the efficiency and reliability of the NEM in line with the National Electricity Objective (NEO). There should be very few areas in the market where reliable and well organised DSP should not be able to make a valuable and efficiency improving contribution, developing over time. So we should ensure that any changes open up opportunities for innovative solutions and do not constrain sound concepts which will emerge over time.

Towards the end of our response we have made several additional comments that may be outside the Terms of Reference of this Review but which could also have a positive impact / influence on the success of DSP in the NEM. We would hope that the AEMC's final report would record these items and recommend that an appropriate body act on the changes we are suggesting.

We have used the term DSP throughout our submission for ease of understanding. However, we believe that DSP is an industry side view of the world and end users would see their actions as a response, or DSR. DSR (or DR) is the accepted term across the world with regard to demand side actions.

Yours faithfully

Ross Fraser
Chairman

Review of Demand-Side Participation in the National Electricity Market
Stage 2: Issues Paper

1. General comments

- ***NEM Market Design – Urgency and strong decisions required***

  The NEM structure primarily caters for the activities of the supply industry. This is supported by the evidence that over nearly 10 years there has not been any natural emergence of an effective DSP. It is also the very reason behind the need for this Review.

  While not a criticism, it is obvious that strong decisions will need to be made to the prompt establishment of a policy or framework, which will enable the rapid development of an effective DSP. Otherwise we will continue with a market which does not empower end users to the detriment of the Australian economy and our international competitiveness. End users will suffer significantly if the current costs from the inefficiencies remain in the NEM and are then exacerbated by price increases such as for carbon, etc.

- ***Modify NEMMCO's charter to actively develop DSP in NEM Operations***

  Consumers generally lack the resources and competencies to restructure electricity market operations. As market and system operator, NEMMCO is uniquely qualified to undertake DSP market development activities that will help balance the market and improve efficiency.

- ***Empowerment of NEMMCO to conduct trials***

  In our view, NEMMCO should be empowered to conduct limited trials in the market (under exemptions approved by the AEMC) to test arrangements for change prior to the changes being finally defined and locked into Rules. This empowerment could be undertaken on a small scale which would have little impact if any on the market outcomes and hence, in the sprit of the NEO, be acceptable to all parties.

  NEMMCO is well placed to model any trials using real market data that is generally not all available to other parties.

- ***Create New Participant Category for DSP service providers***

  The Rules require most of the services be provided by registered participants only, but most consumers, or their representatives, do not qualify under the current participant definitions even though they can provide many useful services. A new category for DSP service providers is required.

- ***Observations in other markets***

  Energy Response operates as a DSP aggregator in three quite different markets, viz, New Zealand, Western Australia, and the NEM. This first hand experience has provided us with some interesting insights.

  For example:
  - In New Zealand, one of our products did not meet the Rules but an interim exemption was provided within a few weeks from the Energy Commission which enabled this innovative demand side product to be implemented in the market and help improve the stability of the power system.
  - In Western Australia we have found the regulators very interested in supporting DSP for a range of applications in the market. To that end we have been able to register as a Market Customer for the provision of DSP as Reserve Capacity without having the obligations and constraints of being an electricity retailer or generator.

- ***California Energy Policy***

  Michael Peevey, the President of the Public Utilities Commission of California was in Australia in May 2008 and met with delegations from the AEMC, AER, NEMMCO and other interested parties. Michael highlighted that California is determined to reduce its dependency on imported energy as well as that generated from coal fired and nuclear plants. Through the implementation of the "Loading Order" California is seeking to dramatically reduce the impact of Climate Change, improve the efficient use of electricity and make California more energy secure.

  The "Loading Order" directs the utilities in California to assess all infrastructure projects (generation, transmission, etc) by:
  - First consider all Energy Efficiency alternatives,
  - Secondly, consider all Demand Response (ie Demand Side Response and Demand Management) alternatives,
  - Thirdly, consider all renewable options
    And then, if the three alternatives above do not (in combination or in aggregate) achieve the required outcome
  - Build the infrastructure.

This reverses the traditional approaches both there and in Australia, but would assist in steering the future in the right direction for both market efficiency and carbon reduction.

The original White Paper on "Loading Order" is instructive for this Review process and is available at http://www.energy.ca.gov/2005publications/CEC-400-2005-043/CEC-400-2005-043.PDF.

- ***Definition of Terms***

We understand that NEMMCO will propose some consistency in defining terms for this Review. Clarifying the terms will assist all the parties in the consultative process to understand the intent of the changes being proposed by the Review. It is not intended that the understanding of terms such as aggregator, DSR, etc should be locked in the Rules as this could lead to further barriers to innovation in the future.

There are a range of terms that the market is already quite familiar with, eg

- Energy Efficiency (EE)
- Demand Management (DM)
- Demand Side Response (DSR)

The only people who seem to use DSP are those in the government / regulatory area plus NEMMCO. It appears that DSP is used because that is what these parties want to happen, ie Participation. However, EE, DM and DSR are what end users actually do in response to either their own needs or to the electricity market / system to reduce their costs or improve energy efficiency, etc.

DSP therefore is satisfactory as a common term for the market/system needs in response to market/system events such as high wholesale prices, network constraints, reserve provision, Ancillary Services, emergency actions etc. These are events for which the IMO, ISO or market participants are willing to pay for products/services which can meet any one or more of these needs and which are cheaper than and just as reliable as the traditional options employed, creating market efficiencies.

An "aggregator" provides a facility, such as Energy Response's, to efficiently and reliably provide firm DSR to meet these market/system events by contracting end users' load reduction or distributed generation capacities to form commercial products/services that meet these needs.

We support the adoption of a simple set of nationally recognised terms with a clear understanding of what they mean for the purpose of the AEMC DSP Review. Energy Response does not want to see a strict definition of DSR or aggregation in the Rules as this is an emerging and changing role.

Having definitions set in Rules could end up inhibiting the full development of what will be a very valuable contribution to the NEM of the future.

2. Economic Regulation of Networks

It is critical to ensure that there is a strong financial incentive for the Network to seek and choose the most economic outcome for them, with certainty of their financial outcome. This means that the regulatory process must strongly motivate the Network to behave in line with the incentive and sanction them for not achieving the most economic outcome.

The current incentive schemes, even for the Distribution Networks in NSW do not encourage DSP sufficiently and there is little to no incentive working in favour of DSP elsewhere.

While there are some incentives in place they are not specific enough to ensure that non-network solutions are seen as the first approach (for example, as defined in the Californian *Loading Order For Electricity Resources*). Arguably we need to have an energy directive at the highest level along the lines of California which then drives the regulatory rules and processes and the incentive scheme/s to ensure the directive is achieved.

In addition to the above, there are two significant barriers which must be overcome. They are:

- clear rules to ensure fair and transparent comparison between the CAPEX build option and demand side options which will almost certainly be OPEX based solutions, ie, they will not be spending capital but using operating expenses to defer capital expenses;
- that a commitment by the relevant regulator that a non-network solution approved in one regulatory period can be continued in subsequent periods without loss of benefits

so long as the non-network solution provides the same level of supply reliability as the build alternative. It is also critical to the decision by the Network that the DSP solution offered is reliable in its delivery, sustainable over the time required and repeatable.

A further key element of ensuring that sufficient demand side participation takes place and with sufficient reliability is to also ensure that the true value of DSP is accepted by the Network rather than a nominal low value as is often the case at present. The cost of loss to end users from a power failure can be very significant. While the overall supply reliability is generally good, especially in built up areas, the availability of DSP can further improve the reliability by providing partial reductions of loads which are discretionary at that time, along a feeder for example, rather than the whole feeder being turned off and all supply lost until restored.

The Networks tend to heavily discount the "energy at risk" because of the low risk of failure of their plant. But that statistic does not compensate the end user for their loss if the failure does happen to occur. If the Network does have some energy at risk component, they should be required to write to all affected end users and explain the risk to them. After all, the Network is still receiving the full rate under the current regulated fee structure but in some areas has not yet provided sufficient capacity to cover a single point of failure. End users should be made aware of their increased risk and this may heighten the awareness that end users can provide DSP solutions to improve the reliability as well as to improve economic efficiency.

Non-network Incentive Scheme

NSW has implemented an incentive scheme (D-Factor) which has had some influence on the use of end user resources to meet peaks in physical demand on the Distribution networks. The key concern about this is that very little of the incentive benefit received by the network is passed through to the end users who provide the resources for the non-network solution. This makes a very good business case for the Network but is no better for the end user or the organiser of the non-network solution.

We encourage and support the national adoption of such an incentive scheme including to Transmission applications but with a rule that at least 50% of the incentive received is passed through to the providers of the non-network solutions. The money to fund this scheme comes from a levy on all end users in NSW so effectively should be a transfer of money from the general mass to those who create the benefit, not just the Network.

While we agree that revenue cap regulation favours DSP more than price caps, our experience indicates that NSPs require explicit incentives or obligations in order to pursue DSP solutions. Hence, we strongly support the DM Incentive Schemes for all Networks. This does not however mean that the incentive scheme should be in place forever but it must be there to encourage the change. As the change is progressively implemented, the scale of the incentive should be progressively reduced. Again, this is part of the plan for change in these areas in both California and Europe.

3. Network Planning

The key issue in relation to network planning is to ensure that a suitable lead-time is allowed for the formation competitive non-network solutions to be developed. The Network planners review their plans every year and (generally) are required to make these plans public. They allow themselves sufficient time to develop the design and costs leading up to the next build project and it is important that they also include in their planning schedule a suitable time for development of non-network alternatives. We suggest that this period must be a minimum of six (6)

months prior to the required service of the non-network solution for distribution and a minimum of twelve (12) months for larger and more complex non-network solutions for transmission networks.

There is valuable information in most of these published network plans that can be used to identify opportunities in the areas serviced by, for example, individual transmission systems, substations or long rural feeders. However, some additional data is also required to enable consumers or their representatives to identify opportunities where they could contribute to a more efficient network. The information provided at the moment is lacking in detail. For example, the key for DSP is to understand the daily profile/s for the peak day/s for the next few years ahead.

We have noticed in our DNSP discussions that most of the networks have assets that are already constrained. These assets individually may fall below the minimum threshold for the Regulatory Test. Furthermore, a DSP solution is very location dependent, ie, there is a need to find a willing consumer/s or embedded generation exactly where constrained asset is located.

Undertaking consultation processes for all constraints would impose significant administrative burden on the NSPs. Instead, we suggest that the NSPs inform the community with key information on their constraints. For example, each NSP could maintain a register of constraints on their website, or on a central website for all NSPs, with key information that would be useful for DSP solution providers. Minimum information would need to include location, magnitude, frequency, timing, peak day profile and seasonality of the support required.

NSP consultation documents typically do not generally provide the right information for DSP solution providers to assess the opportunity, nor do they provide sufficient time for the proponents to develop a solution. We suggest that the NSP should develop DSP options in parallel with the network build options, instead of the current practice where they develop the network augmentation options, which are then released to the community for comment and alternatives.

The information often does not correctly reflect the extent of the losses that would be incurred by end users if the supply fails. Generally the measure of “unserved energy” is heavily discounted by the estimated low probability of occurrence of the plant failure. However, if there is a plant failure the Network cannot be held accountable and the end users who have suffered the loss cannot seek recompense.

An option could be for a relatively small levy on all end users to build a fund to provide fees for the availability of well organised and reliable DSP. This could be collected by NEMMCO as part of its fee structure but segregated for this purpose.

The fund could then be used as an incentive to pay for DSP where the supply is more at risk. Within the same single cost to the end use, be available to pay for establishing and maintaining a supply of fast acting DSP capable of responding

under a “standing reserve” arrangement confirmed to NEMMCO on a half hourly basis. Similar arrangements are undertaken by North American ISOs for reserve capacity and emergency / security programs.

Under the current arrangements, the mandatory 60% load shedding scheme is a free insurance provided by end users to the networks, NEMMCO and all other end users. While in the national best interest, this process is unfair on those who are totally off supply compared to an option where, through this process, end users only lose a pre-selected portion of their supply in extreme emergencies. As the NEM is a market, DSP must be enabled to participate commercially in supplying these services as they already can in most other markets.

Valuation of DSP

We have noticed that for similar sized capital works, different NSPs will assign significantly different value to a DSP solution. NSPs may do this because they are inexperienced in using DSP as an alternative to their traditional build option. Hence, they consider it unreliable and discount its value, or they may prefer to deal with network solutions only. Low valuations can make DSP uneconomic. To reduce this tendency we suggest:

- Transparency and standardisation of the analysis of DSP solutions and their comparisons with the build alternative.
- Trial programs free from regulatory penalties to help the NSPs gain experience and confidence.

In some regulatory regimes there are R&D and innovation allowances provided to the Networks and these should be directly available to consumers and third parties as well. Almost all of the innovation to date in Australia has come from third parties. Otherwise, these funds have the potential of being absorbed by NSPs without delivering the major changes required.

Form of price control as a barrier

Demand side actions including energy efficiency, demand management and demand side responses all reduce the need for infrastructure and demand side responses to peak physical demand also make the investment in the infrastructure more efficient. The price regime needs to take this into account.

An effective set of demand side actions will reduce the rate at which new / additional network assets need to be constructed. This is a good outcome created by the support of demand side programs but it probably means that the form of the determination of how networks should receive their income will need to change. We are not experts in the area so do not propose any specific suggestions.

Tariffs as a barrier

The cost of providing the infrastructure to supply the 'last' kWh of electricity demand is estimated by us to be over $100 per kWh. It is obviously unrealistic to charge end users anything like that rate for peak demands.

The history of tariffs shows that they have generally reflected averaged cost of supply. Major deviation from this will almost certainly be politically unacceptable. Coupled with the roll out of smart meters, we would support much more relevant time of use prices.

We strongly support the roll out of AMI which will enable time based measurement of electricity used (or for DSP purposes, reduced or not used). Being able to measure like this is also an essential requirement for an effective DSP. Time of use tariffs, DSP, energy efficiency, solar power, renewable generation, etc, will all have to contribute effectively to the efficient electricity markets of the future.

It is our view that a strong and effective participation in DSR programs will provide value obtained from the market (both physical and financial) for the participating end user in addition to value from new tariffs.

4. Network Access and Connection Agreements

Minimum technical standards

While there has been a degree of standardisation in connection requirements for very small (up to 2kW) or inverter connected generators, there is little standardisation beyond this.

Small embedded generators (up to 5MW), are common in commercial and industrial buildings, and have great potential for use in DSP. The technical standards required to connect such generators vary widely between LNSPs, and are often unjustifiably onerous for such small embedded generators.

For example, to permit an embedded generator to export power, one LNSP specifies that a particular form of protection must be implemented in a way that requires extra equipment to be installed at the substation. Most of this LNSP's substations have no space for this equipment, necessitating extensive design and construction work on the substation, which is prohibitively expensive for small embedded generation projects. Largely equivalent protection could be achieved without any works at the substation, but this option is not offered.

Such excessive requirements can lead to embedded generation projects being abandoned as uneconomic, or to them being prevented from exporting, hence

limiting their ability to contribute to DSP only up to the level of their local load at the time that DSP is needed.

It would be highly desirable to have a standardised set of protection requirements for small embedded generators. The G59/1 recommendations seem a suitable candidate. These are used in the UK for generators under 5MW connecting at 20kV or below, and a wide range of control and protection equipment is designed around their requirements.

Deep connection costs

In most cases where the proponent of a small embedded generator is required to pay deep connection costs, the project will simply be abandoned, or scaled down to the point that the deep connection costs are not incurred. In general, small embedded generators are not sufficiently profitable to be economic when burdened with these extra costs.

If the connection of a small embedded generator to part of a distribution network requires enhancement to the network beyond the connection point, this is often a sign that the network has not been designed to support embedded generation. If it is accepted as a policy that there should be a shift towards more distributed generation, it does not make sense for each distributed generation proponent to bear the costs of rectifying this outdated design.

For example, high fault levels are a major issue for embedded generator proponents. LNSPs are required to keep fault levels below certain specified maxima for safety reasons. However, there's no incentive for them to have reasonable fault levels in general - just less than the permitted maxima. As a result, fault levels are close to these maxima across much of the distribution network in many urban areas and do create significant barriers to embedded generation contribution to an effective DSP in the NEM.

When an embedded generator is connected, it necessarily contributes to or increases fault levels. At present, it is solely the responsibility of the generator proponent to ensure that fault levels throughout the distribution network do not exceed the permitted maxima due to the connection of the generator. The generator proponent can fit equipment which reduces the contribution to the fault level from their generator, but the lower the contribution allowed, the more expensive this approach becomes. It seems reasonable that, in situations where the fault level is already close to the limit, the DNSP should share some responsibility for reducing it as they will have to address this matter in the near future anyway.

Contractual arrangements and balance of negotiating power

These issues are very well addressed by CUAC's April 2008 report "Beyond Free Market Assumptions: Addressing Barriers to Distributed Generation".

5. Wholesale Markets and Financial Contracting

Current market design effectively inhibits DSP in the wholesale market. The concept of scheduled load has totally failed to attract consumer attention. Currently, the only registered loads are large pumping loads, which are parts of registered generators.

The pros and cons of this matter are described in the independent submission by Jim Gallaugher.

While end users can participate indirectly in the market by working with their retailers, retailers are now vertically integrating with generation assets and are also motivated to be well covered by financial hedges (refer to 7.1) and have recently shown little to no interest in DSP.

Large retailers do contract some DSP ("Load Curtailment") from larger end users. Our observation is that they rarely use it, to the frustration of the end users. The main reason that they do not need to call on this DSP is that they are sufficiently covered against extreme price spikes by purchased hedges or their own generation. The contractual terms for this DSP can also result in this DSP not being available for other purposes in the market.

Both the current trend of allowing vertical integration of retailers and generators and the requirement for full hedge cover are definitely working against DSP. We feel that modification in dispatch arrangements in itself will not have any material impact in consumers' participation in the wholesale market. If the price is high the generation arm of the business is happy – if the price is low the retail arm of the business is happy.

One potential solution is to modify the market design so the DSP can be bid directly to the spot market to earn revenue. This would require substantial changes to the current market structure and dispatch processes. We do not think this is worthwhile from a DSP perspective.

The price in an energy only market contains both the price of delivered energy and also covers the cost of some of the assets providing reserve to the market. An option here is to separate out the energy only (to be supplied by generators) from the reserve which could be supplied in a competitive arrangement by generators and DSP. This is what we mean by a "Standing Reserve" and we believe this needs very serious consideration.

We believe that a large barrier to DSP in the market is that the cost of meeting the NEM reserve requirements is tightly bundled in the energy price. It is important to find a way to unbundle this and establish a cost for providing the reserve required. This is the key difference and a major entry point for DSP in most other electricity markets, and it is denied in the NEM due this bundling.

It is feasible that an aggregated DSP contract for (say) 500MW could be made available to NEMMCO which is able to meet the technical and availability requirements for reserve. This would then add another significant element to the competition in the NEM.

It is interesting to note that the cost of providing Reserve is quite high (eg, above $100,000 per MW per year) in other markets and this is hidden in the NEM. Separating this out into a competitive environment would improve the NEM efficiency significantly and encourage the formation of strong and sustainable DSP across the NEM Regions.

An alternative solution is to reduce the magnitude of reserve being managed through the spot market. A certain portion, say 20% to 60% of the required reserve be allocated to the DSP and be procured off-market (contracted) or through a dedicated market mechanism. We believe that there is substantial quantity of DSP in each NEM region that could participate in this market in this way.

Also see comments in 6.

Level of VoLL

Ultimately, Energy Response would support a more appropriate level of price cap that recognises a more realistic economic value of sustained electricity supply. However, we currently oppose such a change because of the lack of an effective DSP mechanism in the NEM. It would be grossly unfair on end users to impose a significantly higher cap until the demand side capabilities have developed to the point of immediate and substantial responses to high prices. This will come but it will take some years.

6. Reliability and Power System Security

We are very pleased to see that “Standing Reserve” is still being considered. This is very important and offers a major opportunity to encourage DSP. One of the problems we see is how to define what is meant by a “Standing Reserve”.

We see this of such importance that we suggest that the Review’s Reference Group should be convened to have a whole session on this matter.

NEMMCO is responsible for ensuring that the power system is operated in a secure manner, meaning that there is enough available energy and a viable transport system for immediate and anticipated requirements. It meets these requirements by actively managing the resources available to it under the current Rules. During abnormal conditions, it can take actions to maintain power

system security by imposing constraints, directing generators, or forcibly shedding load to whole areas.

The Rules do not provide NEMMCO with the ability to use DSP, under contract or via the market, to maintain power system security (except for NCAS in extremely limited circumstances). The Rules allow NEMMCO to treat forced load shedding as free DSP, without offering an opportunity to the consumers to offer their load at a price, or recompense to those turned off. This means that those who are sacrificed and seriously inconvenienced by this wholesale load shedding provide a very significant benefit to those who are not shed.

Well organised DSP will be capable of fulfilling this obligation reliably and sustainably, building up progressively from relatively small quantities of, for example, a few hundred MW initially to thousands of MW. Energy Response has identified over 1000 MW to date estimates that up to 4000 MW could be available for this role under the right commercial and technological framework. As the quantity of DSP available for this purpose builds up, the total generation and transmission required to provide the reserve required in each region will be reduced, meaning that the supply side assets will become more efficient. The logical and best way to manage shortage of supply or reserve at any point in time is to reduce demand and this is the core of what we believe must be implemented in the NEM.

If the market fails to deliver sufficient energy and reserve (due to unexpected demand or due to unplanned outages of plant or network) and NEMMCO requires additional energy or reserve immediately, or up to 6 months in advance, it essentially has four choices to ensure system reliability and security:

- It can negotiate with generators so that they make themselves available on good-faith basis,
- It has the power to direct generators, and compensate them for it,
- It can instruct NSPs to shed load without compensation, or
- It can dispatch scheduled loads.

It is interesting to note that NEMMCO's decision to direct generators is not necessarily linked to the dispatch price being at VoLL. The single node nature of the market design often results in situations where energy is required within an area in a region, but the dispatch price remains below the price offered by a generator located in the area of the shortfall.

Furthermore, localised constraints often result in high spot prices, which again may be due the single node nature of the market design. A single node market is simpler to administer, but loses in efficiency.

We contend that DSP should be used to maintain system reliability and security in pre and post-contingency situations, be it due to global or localised energy shortfalls or network issues. Its use should be driven by security considerations only, without any pre-condition about the dispatch price being at VoLL.

7. Additional matters for AEMC consideration

Several matters, which are outside the ToR of this Review, are raised below. Since they could make a significant difference to the effectiveness of DSP in the NEM we would appreciate the AEMC including them in the final report and identifying the party or parties who could take responsibility for them.

7.1. Australian Accounting Standard [Guideline]

We understand that the Australian Accounting Standards issued a guideline[?] recently to ensure that electricity retailers are required to be fully hedged or report their risk exposure on their balance sheet.

While this is a sound practice financially it seems to have had a significant impact on the interest by electricity retailers purchasing any demand reduction from their customers at times of high prices as they are now covered by the purchase of financial hedges.

We strongly believe that fast acting, automated, fully reliable (aggregated) DSR can also form this risk mitigation role just as certainly. This physical approach would provide competition to the financial hedge markets and be valuable to all end users, not only those participating in providing the aggregated DSR, and should be able to be reported by the retailer in lieu of hedge cover.

7.2. Awareness of what the end user can do individually / collectively

As part of the National DSR trial in 2002, the EUAA commissioned an independent assessment. One of the key recommendations of the assessment report was that a national awareness campaign would be very valuable in supporting the implementation of an effective DSR program in the NEM.

A small program was undertaken by the EUAA, supported by the AGO, but the full awareness campaign has not proceeded. This is a contributing factor to why this Review is still required.

We strongly recommend that a national awareness campaign is run which now could also cover energy efficiency, demand management, demand side response, carbon, etc.

7.3. Environmental and Community Benefits

The independent Report by the EUAA's Demand Side Response DSR Trial in the NEM (April 2004) noted the environmental and community benefits of an effective DSP facility in the NEM.

Importantly, the recent Capgemini etal Report "Demand Response: a decisive breakthrough for Europe" quantifies the environmental and community benefits of an effective DSP to the European Community. Refer - http://www.capgemini.com/resources/thought_leadership/demand_response_a_decisive_breakthrough_for_europe/.

In Australia there is little progress towards official recognition of the significant environmental and national benefits, which will be achieved by an effective DSP. This is also a key matter that needs to be referred to an appropriate party for action.

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