

Australian Energy Market Commission
BY EMAIL

Reposit Power Pty Ltd
ABN 65 163 437 429
Unit 17, 2 Yallourn St, Fyshwick ACT 2609

Date: 9th September 2015

Dear Sir/Madam,

Reposit Power develops and markets software to deliver services from electricity storage. This software allows an appropriate Registered Participant to use electricity storage to deliver wholesale energy services and market ancillary services into the respective AEMO wholesale markets.

Currently The Rules require wholesale energy and ancillary services provision from a market load to be represented by a single Market Customer in accordance with 2.3.5(a). This is because of the one to one relationship that exists between a market load and a Registered Participant as stipulated in 2.12(8)(ii).

The effect of this is that market ancillary services provision from a market load must be represented by the same Market Customer that is responsible for purchasing/selling energy from/to the wholesale energy market. This monolithic representation of market load means that an electricity customer must sell their ancillary services provision to the same Market Customer from whom they purchase energy.

This creates a barrier to the development of new and innovative electricity services as it restricts an electricity consumer to selecting a single FRMP (and their commercial terms) for all of their load's interaction with AEMO's wholesale markets.

Whilst the main body of thought on MTR has been around multiple relationships for energy, Reposit contends that it should also consider separate trading relationships for energy and ancillary services for a single market load. A comparable disaggregation of representation was achieved with the introduction of the Market Small Generation Aggregator (MSGGA) role. One of the effects of this market development was to give a small generator owner the choice as to whom they would sell their generator's output to. Before this rule change they were limited to selling their generation to their FRMP at whatever price was offered as part of their retail energy contract.

Reposit is not suggesting that the MSGGA role be extended to include ancillary services. There are several ways to achieve this disaggregation of market load representation, each with its own complexities under the rules and AEMO procedures. What is important is that the consideration of multiple trading relationships considers not only choice on wholesale energy representation, but also choice on ancillary services representation.

Thank you for the opportunity to provide input into the MTR consultation process.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'D. Spaccavento', written over a light blue horizontal line.

Dean Spaccavento
Director