



# EECA Consultation Demand Flexibility

## Feedback

### Consultation questions

#### Key end-use products and approach to commercial and industrial

Q1. The main use cases for demand flexibility presented in this paper are: managing peak demand (generation and line capacity) constraints, optimising renewable energy use, and optimising home energy use.

Do you think these are the main use cases?

What other use cases are there?

Those listed plus response to network / generation conditions – fault conditions on the network, managing voltage etc.

Q2. In the residential sector, the following products have been identified as key end-use products for demand flexibility: EV chargers, heat pumps, electric hot water systems which use a storage tank, fridges/freezer, clothes washers, dishwashers, clothes dryers, inverters for solar and battery systems, and HEMS.

Do you think these are the key demand flexible end-use products in the residential sector?

If not, what are the key products and why?

Potentially correct, but to avoid unnecessary complexity should focus on those things that have significant contribution to make. Whiteware are far more complex to manage and have relatively low volume contribution versus EV chargers, battery storage, hot water cylinders and heat pumps.

Also needing to be considered as that many homes with solar already shift loads such as hot water heating, washing machines and EV charging out of peak periods to coincide with periods of high solar output.

Q3. Do you think a standardised end-use product/application-based approach is relevant for the commercial sector, or is a bespoke/customised approach needed?

Bespoke

Q4. What do you think the key end-use products/applications are in the commercial sector?

Opportunities likely would be space heating / cooling, refrigeration and industry specific interruptible loads

Q5. Do you think a standardised end-use product/application-based approach is relevant for the industrial sector, or is a bespoke/customised approach needed?



Bespoke

Q6. What do you think the key end-use products/applications are in the industrial sector?

Very industry specific

Q7. What are the barriers to the uptake of demand flexible technology?

No clear market opportunities to obtain value.

Lack of trust of energy sector.

Lack of aggregators to manage interface between owners and flexibility seekers

### End-use product level components for demand flexible capability

Q8. The paper describes the three main end-use product components for demand flexible capability as: communication protocol, product response, and operational information.

Do you agree that these are the main components for demand flexible end-use products?

What other components or considerations are important for end-use products?

Equally important is the need for an established flexibility market. A field of dreams “Build it and they will come” approach is not going to be effective. Without clear financial opportunities for owners of flexibility resources there will be little interest.

Q9. Do you think to support the development and uptake of demand flexibility there is a need to create a minimum level of standardisation at an end-use product level (covering communication protocol, product response, and operational information)?

There needs to be a national standard and a national market for flexibility services. There are multiple parties looking at the same issues, EA, EECA, EEA, ENA, MBIE as well as individual EDB’s all acting in silo’s. Unless there is a single coordinated approach it is not expected that there will be any useful outcomes.

With the level of investment needed for network and generation upgrades there needs to be a national strategy and plan to minimise costs to end consumers. Different groups acting independently is not efficient and will not lead to the benefits that should be realised.

### Development of demand flexible end-use products

Q10. Would you support EECA creating a voluntary approved list of residential demand flexible end-use products, similar to [EV Smart Charger Approved List](#)

Would not see value. See comment for Q9.

Q11. Would you participate in working groups on the key end-use products to develop voluntary demand flexibility requirements (covering communication protocol,



product response, and operational information)?

If so, what product based working groups would you like to be part of?

As above – yes interested but only as part of a fully coordinated national strategy. Voluntary guidelines will provide limited value. The opportunity needs to be taken more seriously and a comprehensive solution put in place through a focussed coordinated effort.

**Q12. If you are an end-use product supplier, would you manufacture/import/supply end-use products that meet the voluntary specification?**

SEANZ membership includes product suppliers. Indications are only if the specification became relevant and acquirers of flexibility services adopted them – otherwise risk of extra cost for no advantage.