

NATIONAL ELECTRICITY MARKET

CREDIT LIMIT PROCEDURES

PREPARED BY: AEMO Markets

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TITLE: Executive General Manager - Operations

DATE: 9 December 2022



VERSION RELEASE HISTORY

Version	Effective Date	Summary of Changes
1.0	29 January 2013	Initial Version
2.0	1 August 2014	 Amendments to: Address any repeal of the <i>Clean Energy Act 2011</i>. Update section 10.2 for new entrants and inactive participants to improve consistency with standard determination of credit support. Refer to the current version of the Rules.
3.0	1 July 2017	 Amendments to: Include calculation of the prudential margin (PM) with full offsets between reallocation and energy amounts, effective for prudential settings applicable to periods commencing on or after 30 November 2017. Add provisions for determination of a maximum credit limit (MCL) for Market Network Service Providers (MNSPs). Add a section for managing prudential risk during transition from one season to the next. Update the process for estimation of reallocation and generation amounts. Update the section on the impact of the repealed Clean Energy Act 2011.
4.0	1 May 2018	 Amendments to: Update weighting factors for average regional price and regional volatility. Update capping factors for average regional price and regional volatility. Update clause 10.3, relating to the use of reallocations in calculating MNSP prudential requirements. Changes effective for <i>prudential settings</i> applicable to periods commencing on or after 1 May 2018.
5.0	3 December 2019	Amendments to: Reflect new AEMO procedures format. Reflect 5 Minute Settlement Rule Change. Minor spelling/grammatical error fixes. Move the month of April to the winter season.
6.0	18 January 2021	 Amendments to: Add provisions for determination of a maximum credit limit and typical accrual for Demand Response Service Providers under the Wholesale Demand Response Mechanism.
6.1	17 September 2021	 Minor update to: Clarify that Demand Response Service Providers under the Procedure are only those providing wholesale demand response.
7.0	9 December 2022	Amendments to incorporate energy transactions for stand-alone power systems into determination of prudential settings from 30 May 2023.



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FIGURES



1. INTRODUCTION

1.1. Purpose and scope

These are the *credit limit procedures* (Procedures) made under clause 3.3.8 of the National Electricity Rules (NER). These Procedures have effect only for the purposes set out in the NER. The NER and the National Electricity Law prevail over these Procedures to the extent of any inconsistency.

These Procedures establish the methodology by which the Australian Energy Market Operator (AEMO) will determine the *prudential settings* for each *Market Participant* so that the *prudential standard* is met for the *National Electricity Market (NEM)*.

The prudential settings for a Market Participant comprise its maximum credit limit (MCL), outstandings limit (OSL) and prudential margin (PM). The MCL is the sum of the OSL and the PM.

The *prudential standard* means the value of the prudential probability of exceedance (POE), expressed as a percentage. The POE means the probability of a *Market Participant's* MCL being exceeded by its *outstandings* at the end of the *reaction period* following the *Market Participant* exceeding its OSL on any day and failing to rectify this breach. Clause 3.3.4A of the NER defines the *prudential standard* as 2%.

1.2. Definitions and interpretation

1.2.1. Glossary

Terms defined in the National Electricity Law or the NER have the same meanings in these Procedures unless otherwise specified in this clause. Terms defined in the NER are intended to be identified in these Procedures by italicising them, but failure to italicise a defined term does not affect its meaning.

The words, phrases, and abbreviations in the table below have the meanings set out opposite them when used in these Procedures.

Term	Definition
Current SAPS settlement price	In relation to a calculation under these Procedures, the SAPS settlement price for the relevant regional reference node for the financial year in which the calculation is undertaken or, if AEMO has not yet published the SAPS settlement price for that financial year at the time of the calculation, the most recently published SAPS settlement price for the regional reference node.
DRSP	demand response service provider
ex ante	Describes a <i>reallocation transaction</i> that occurs in or after the earliest <i>trading interval</i> which it may be processed as an 'ex ante reallocation' based on the time of registration of the applicable <i>reallocation request</i> in accordance with the <i>reallocation timetable</i>
GST	Goods and Services Tax
LWPR	load weighted price ratio
MCL	maximum credit limit
MLF	marginal loss factor
MNSP	Market Network Service Provider
NER	National Electricity Rules



Term	Definition
OSL	outstandings limit
PM	prudential margin
PM Full Offset	As described in clause 4.3.3
PM Limited Offset	As described in clause 4.3.3
POE	prudential probability of exceedance
PRAF	Participant Risk Adjustment Factor specific to Market Participant
Procedures	credit limit procedures
RRP	regional reference price
SGA	Market Small Generation Aggregator
TA	typical accrual
TI	trading interval
VF	volatility factor

1.2.2. Interpretation

These Procedures are subject to the principles of interpretation set out in Schedule 2 of the National Electricity Law.

1.3. Related documents

Reference	Title	Location
500-0105	Reallocation Procedure: Swap and Option Offset Reallocations	AEMO website: http://www.aemo.com.au/Electricity/National- Electricity-Market-NEM/Settlements-and- payments/Prudentials-and- payments/Procedures-and-guides
500-0096	Reallocation Procedure: Energy and Dollar Offset Reallocations	AEMO website: http://www.aemo.com.au/Electricity/National- Electricity-Market-NEM/Settlements-and- payments/Prudentials-and- payments/Procedures-and-guides

2. CREDIT SUPPORT IN THE NEM

AEMO's obligation to settle payments due to Market Participants in relation to a billing period is limited to the extent of funds received from Market Participants in respect of that billing period or provided under credit support arrangements. The relationship between AEMO and the Market Participants is illustrated in the following diagram:



Net receivers Net payers Market Market Credit Support Participant Participant Provider **AEMO** Credit Support Market Market as principal Participant Participant Provider in NEM settlement Credit Support Market Market Participant **Participant** Provider cash flows credit support flows

Figure 1 Settlement of NEM transactions

If a Market Participant cannot satisfy the acceptable credit criteria, that Market Participant must provide AEMO with an unconditional guarantee in the form specified by AEMO from a credit support provider that meets the acceptable credit criteria for an amount that is greater than or equal to the Market Participant's MCL. AEMO may draw on the guarantee if payment is not cleared in time to meet a settlement deadline.

Any shortfall in *AEMO*'s recovery from any *Market Participant* in relation to a *billing period* is shared proportionally by *Market Participants* due payments in that billing cycle in accordance with clauses 3.15.22 and 3.15.23 of the NER.

3. PURPOSE AND REQUIREMENTS OF PRUDENTIAL SETTINGS

3.1. Maximum credit limit

- (a) Confidence of the *Market Participants* in the financial settlement of spot electricity transactions is critical to the operation of the *NEM* and setting the *spot market* price (*regional reference price* or RRP).
- (b) The NER require *Market Participants* to provide *credit support* in the form of an unconditional guarantee from an approved financial institution to pay *AEMO* an amount up to a pre-determined value, which is the MCL.
- (c) The MCL is that amount which results in a 2% likelihood of a *Market Participant's credit* support being exceeded by its outstandings at the end of the reaction period following the *Market Participant* exceeding its OSL on any day, and failing to rectify this breach.
- (d) AEMO's processes for determining the MCL have been designed to take account of seasonal differences in RRPs, volatility, and *Market Participants'* particular characteristics.

3.2. Outstandings limit

The purpose of the OSL is to ensure that the NEM is not exposed to a prudential risk inconsistent with the *prudential standard* during the OSL time period (T_{OSL}), which is 35 days.



3.3. Prudential margin

The purpose of the PM is to ensure that the NEM is not exposed to a prudential risk inconsistent with the *prudential standard* during the period of suspending a defaulting *Market Participant* from the *NEM* (the *reaction period*, T_{RP}, which is seven days).

3.4. NER requirements for prudential settings

These Procedures are based on a number of components that *AEMO* must consider in determining *prudential settings*, as set out in clause 3.3.8(d) of the NER:

- (a) the RRP for the region for which the *prudential settings* are being calculated;
- (b) the time of year;
- (c) the volatility of *load* and RRP for the *regions*;
- (d) AEMO's estimate of the generation and load for each Market Participant,
- (e) the relationship between average load and peak load for each Market Participant;
- (f) any ex ante *reallocations* for the period being assessed;
- (g) the correlation between energy, reallocations, and the RRP;
- (h) the statistical distribution of any accrued amounts that may be owed to AEMO;
- (i) the relevant time period for which the *prudential settings* are being calculated; and
- (j) any other factors AEMO considers relevant having regard to the objective of the Procedures.



4. MEETING THE PRUDENTIAL STANDARD

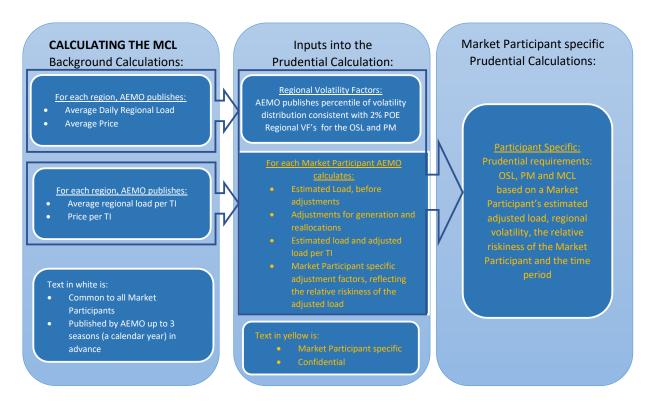
4.1. Approach to calculating the MCL

- (a) The MCL calculation takes into account:
 - (i) expected regional load and RRPs;
 - (ii) a measure of regional volatility consistent with the 2% POE target;
 - (iii) Market Participants' expected load, generation, and reallocations;
 - (iv) a Market Participant's load-weighted price applicable to their load, generation and reallocations; and
 - (v) the relevant time period, in days.
- (b) In undertaking these calculations, there are a number of:
 - (i) regional calculations that establish the regional inputs into the calculation of a Market Participant's OSL and PM;
 - (ii) regional calculations, common to all Market Participants, that are used in the calculation of an individual Market Participant's OSL and PM; and
 - (iii) Market Participant specific calculations that result in a Market Participant's OSL and PM
- (c) The diagram below provides a high-level schematic of the relationship between the *regional* calculations and the calculation of a *Market Participant's* OSL and PM.
- (d) There are also a number of elements common to the calculation for *Market Participants* in all *regions*, which include:
 - (i) the seasonal calendar used for the three identified seasons summer, winter, and shoulder;
 - (ii) the time periods used in the OSL and the PM; and
 - (iii) where appropriate, goods and services tax (GST).
- (e) This clause 4 lists the elements in each part of the MCL calculation for *Market Participants* other than *Market Network Service Providers* (MNSPs) and *Demand Response Service Providers* (DRSPs)¹. The specific equations are discussed in clauses 5 to 9 of these Procedures.
- (f) Many of the inputs and calculations described in this clause cannot be readily applied to the determination of *prudential settings* for MNSPs. In order to meet the *prudential standard*, the MCL for MNSPs will be determined in accordance with clause 10.2.
- (g) Many of the inputs and calculations described in this clause cannot be readily applied to the determination of *prudential settings* for DRSPs. In order to meet the *prudential standard*, the MCL for DRSPs will be determined in accordance with clause 10.4.

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¹ For the purposes of calculating MCL under this Procedure, a DRSP is defined as a person who offers and provides *load* as *wholesale demand response* in respect of a *wholesale demand response* unit. It <u>does not</u> include a person who offers and provides *load* as a *market ancillary service* in respect of *ancillary service load*.





4.2. Statistical approach to the development of these Procedures

4.2.1. Overview

- (a) The Procedures have been designed to:
 - (i) take account of all the available data, using all the RRP and *load* data available for each of the *regions* of the *NEM*;
 - (ii) smooth changes in *Market Participants'* required MCLs from one season to the corresponding season in the following year resulting from one-off changes to average RRPs and *regional* volatility, while responding to longer-term trend changes; and
 - (iii) provide for *Market Participant* specific factors to be taken into account where these characteristics differ from those of the *region*.
- (b) AEMO intends that the application of the Procedures will meet the prudential standard on average over time, with no systematic or persistent bias in the estimated MCL for any category of Market Participants. Given the nature of the estimation process and the information used in calculating these Procedures both of which are backwards-looking from time to time it can be expected that the prudential standard may not be met or may be exceeded. While AEMO is required to publish an annual report of the performance of these Procedures in meeting the prudential standard (Clause 3.3.8(f) of the NER), several years' experience of operating the Procedures will be required before a detailed evaluation of their performance can be undertaken.

4.2.2. Approach to calculating the level of volatility consistent with a 2% POE

(a) Regional inputs used in the volatility factor calculation



- (i) The historical *regional load*, RRP and the relevant time period are used to calculate the level of total *outstandings* for a given *region*, without adjusting for *generation* or *reallocations*.
- (ii) Estimated *regional load* and estimated RRP are calculated on a seasonal basis, using an exponential weighted moving average process that considers all available data for the relevant season. This approach considers the seasonal data as a continuous series over the entire period for which data is available.
- (iii) The level of OSL and PM required to meet a 2% POE for each *region* is assessed against the historical *regional outstandings*. The OSL and PM requirements are determined with regard to estimated *regional loads*, estimated *regional* RRPs, estimated volatility factors (VFs) for the PM and OSL and the appropriate time periods (T_{OSL},T_{RP}).
- (b) Calculating the appropriate level of volatility
 - (i) The distribution from one day to the next in the level of *outstandings* (volatility) is used to establish the point on that distribution consistent with a 2% POE for a given *region*. The point on the distribution consistent with a 2% POE differs by *region*.
 - (ii) AEMO publishes its calculation of the percentile of the volatility distribution consistent with a 2% POE for each *region* annually in advance.

4.2.3. Approach to calculating OSL and PM

- (a) The approach to calculating a *Market Participant's* OSL and PM considers:
 - (i) regional parameters such as estimated RRP and estimated volatility;
 - (ii) an estimate of a Market Participant's future load, generation and reallocations; and
 - (iii) a *Market Participant's* specific characteristics, through the use of a load-weighted price ratio (LWPR) for *load*, *generation* and *reallocations*.
- (b) The LWPR is:
 - (i) based on the *Market Participant's* expected profile for *load* (adjusted for MLFs), *generation* (adjusted for MLFs), or *reallocations* per TI as appropriate, as well as expected *regional* RRPs; and
 - (ii) expressed as an index relative to the expected RRP, where a value greater than one indicates that a *Market Participant's* load-weighted price is higher than that for the *region*.

4.3. Parameters used in these Procedures

4.3.1. Elements common to all regions

(a) Season definitions

There are three seasons used for all regions:

- (i) Summer, which is the period beginning 1 December and ending 31 March;
- (ii) Winter, which is the period beginning 1 April and ending 31 August; and
- (iii) Shoulder, which is the period from 1 September to 30 November.

Unless explicitly stated, all factors and calculated items are performed for each season.



(b) Outstandings Limit Time Period (T_{OSL}) and Reaction Period Time Period (T_{RP})

The OSL time period (T_{OSL}) is the typical number of trading days used to calculate a *Market Participant*'s OSL. It has two components, namely:

- (i) the billing period, which is defined as seven days; and
- (ii) the payment period, which is estimated to be 28 days.

Accordingly, the OSL time period (Tosl) is 35 days.

The reaction period time period (T_{RP}) is seven days.

- (c) Goods and Services Tax rate (GST)
 - (i) The GST rate is the value of the GST which is applicable for the three month period following the date of the OSL and PM calculation.
 - (ii) GST applies to *energy* purchases and sales in the NEM. Accordingly, the OSL and PM calculation allows for the additional liability due to GST on the value of *AEMO*'s estimate of *energy* trading. As *reallocation transaction* amounts do not attract GST, it is not applied to the *reallocation* elements of the calculation.

4.3.2. Regional level calculations

- (a) The parameters resulting from the *regional* level calculations are identical for all *Market Participants*. *AEMO* publishes the seasonal parameters in advance for all *regions*.
- (b) Calculations used in determining VF for the OSL (VFOSL_R) and the PM (VFPM_R)
 - (i) Regional level parameters are calculated for each season:
 - (A) estimated average RRP for the region (P_R); and
 - (B) estimated average daily regional load (ERL_R).
 - (ii) These parameters are used to derive the Outstandings Limit Volatility Factor (VFOSL_R) and the Prudential Margin Volatility Factor (VFPM_R). The VFOSL_R and the VFPM_R are derived from the distribution of the estimated *load* (ERL_R) and estimated RRP (P_R) and are set at a level to ensure that, for each *region*, the *prudential standard* is met.
- (c) Calculations used in determining a Market Participant's OSL and PM
 - (i) Regional level parameters calculated for each season per TI:
 - (A) estimated RRP (P_{TLR}) for the *region*;
 - (B) estimated capped average RRP for the region for cap value C (P_{TI,R,C}); and
 - (C) estimated average regional load (ERL_{TI,R}).
 - (ii) These parameters are used to adjust a *Market Participant's* characteristics for its behaviour relative to that of the relevant *region*. These parameters are the same for all *Market Participants* in a given *region*.

4.3.3. Market Participant specific calculations

- (a) The calculation of a *Market Participant*'s OSL considers:
 - (i) the *Market Participant's* trading behaviour in the *NEM*, including *energy* purchases (EL_R), *generation* sales (EG_R) and *reallocation* (RC_R , RCS_R , $RCC_{R,C}$ where the *Market Participant* is the credit party and RD_R , RDS_R , $RDC_{R,C}$ where the *Market Participant* is the debit party) (refer to clause 9.4.5);



- (ii) swap *reallocations*, valued at the difference between the strike price (PCS_R) and the VF adjusted average RRP;
- (iii) cap reallocations (floor reallocations are not included in the calculation);
- (iv) the relationship between *regional load* and the *Market Participant's* MLF adjusted *load*, expressed in a Participant Risk Adjustment Factor (PRAF_{L,R}) that adjusts the OSL to reflect the *Market Participant's* relative risk of their *load*;
- (v) the relationship between *regional load* and the *Market Participant's* MLF adjusted *generation*, expressed in a Participant Risk Adjustment Factor (PRAF_{G,R}) that adjusts the OSL to reflect the *Market Participant's* relative risk of their *generation*;
- (vi) the relationship between *regional load* and the *Market Participant*'s net energy and swap *reallocations*, expressed in a Participant Risk Adjustment Factor (PRAF_{R,R}) that adjusts the OSL to reflect the *Market Participant*'s relative risk of their swap and energy *reallocations*;
- (vii) the relationship between *regional load* and the *Market Participant's* net cap *reallocations*, expressed in a Participant Risk Adjustment Factor (PRAF_{R,R,C}) that adjusts the OSL to reflect the *Market Participant's* relative risk of their cap *reallocations*; and
- (viii) the distribution of credit and debit amounts across *regions*. In cases where there is more credit amount than debit amount in a given region, the OSL reduction attributable to the credit in excess of the debit amount (up to the amount of the total of debit amount in excess of credit amount in each of the other *regions*) is calculated without the VF. This approach is based on an assumption that high prices are not correlated across *regions*.
- (b) In calculating a PM for a *Market Participant*, AEMO applies one of two methodologies:
 - (i) PM Full Offset (applicable to a *Market Participant* that has opted to apply PM Full Offset under clause 4.3.5 for the period to which the calculation applies). The calculation methodology for PM Full Offset is based on components that correspond with the OSL calculation described above, with *reallocation amounts* taken into account in accordance with clause 9.4.5.
 - (ii) PM Limited Offset (applicable in all other cases). The calculation methodology for PM Limited Offset is based on components that correspond with the OSL calculation, but excluding the *Market Participant's*:
 - (A) quantity and pattern of *trading amounts* where the estimate of the aggregate of all *trading amounts* for the period being assessed is a positive amount; and
 - (B) quantity and pattern of *reallocation amounts* where the estimate of the aggregate of all *reallocation* amounts for the period being assessed is a positive amount.
- (c) The PM is always assessed over a period equal to the *reaction period* (T_{RP} , defined as seven days).

4.3.4. General calculation principles for OSL and PM

- (a) A scaling factor is used to account for GST.
- (b) After adjustments to a *Market Participant's* estimated *load, generation* and *reallocations,* a *Market Participant's* OSL is calculated as a function of:
 - (i) The Market Participant's estimated load, generation, and reallocations;



- (ii) the estimated RRP, adjusted by a PRAF specific to that *Market Participant*; and
- (iii) the VF for the OSL applicable to the relevant region (VFOSL_R);
- (iv) GST; and
- (v) the OSL time period (T_{OSL}), which is 35 days.
- (c) A *Market Participant's* PM is calculated on a similar basis, using parameters specific to the *reaction period*, T_{RP}.
- (d) The OSL may be negative but no less so than the absolute value of the PM. The PM may not be less than zero.
- (e) Rounding is applied to the OSL and PM to eliminate insignificant changes and to simplify the management of credit support.

4.3.5. Application of Full Offset

- (a) PM Full Offset can be applied in determining a Market Participant's PM if:
 - (i) the PM is to apply for a period commencing on or after 30 November 2017; and
 - (ii) the Market Participant has opted to apply PM Full Offset under this clause for the period to which the PM calculation applies, and that option has been recorded in AEMO's prudential systems.
- (b) A Market Participant may at any time opt to:
 - (i) apply PM Full Offset; or
 - (ii) disable PM Full Offset (in which case PM Limited Offset will apply),
 - using the request form specified by AEMO for that purpose, with an effective date not less than 10 *business days* after submitting the form.
- (c) After successful validation of an application, the option will be recorded in AEMO's prudential systems and confirmation will be sent to the *Market Participant*.

4.3.6. Stand-alone power systems

Energy transactions for *connection points* in a *regulated SAPS* are accounted for in the *prudential settings* of the *financially responsible Market Participant* using the relevant estimated *SAPS energy* (load or *generation*) and the current *SAPS settlement price* for the applicable *regional reference node*.



5. THE OUTSTANDINGS LIMIT CALCULATION

The OSL Calculation is represented by:

 $OSL = \Sigma_R MAX(OSL_{R,I}, OSL_{R,U})$

 $OSL_{R,U} = (VEL_R + VRD_R + RD\$_R) \times T_{OSL}$ (OSL increased by debit)

 $- (VEG_R + VRC_R + RC\$_R) \times T_{OSL}$ (OSL decreased by credit)

 $OSL_{R,I} = (VEL_R + VRD_R) \times T_{OSL} / VFOSL_R$

- (VEG_R + VRC_R) x T_{OSL} / VFOSL_R

+ $(RD\$_R - RC\$_R) \times T_{OSL}$

 $VEL_{R} = ((EL_{R} \times P_{R} \times PRAF_{L,R} \times VFOSL_{R}) + (EL_{RS} \times SAPSSP_{R})) \times (GST + 1)$ (value of energy load)

 $VEG_R = ((EG_R \times P_R \times PRAF_{G,R} \times VFOSL_R) + (EG_{RS} \times SAPSSP_R)) \times (GST + 1)$ (value of energy generation)

 $VRD_R = RD_R \times P_R \times PRAF_{R,R} \times VFOSL_R$ (value of debit *energy reallocations*)

+ $RDS_R \times (P_R \times PRAF_{R,R} \times VFOSL_R - PDS_R)$ (value of debit swap *reallocations*)

+ Σ_{C} [RDC_{R,C} x

 $(P_R \times PRAF_{R,R} \times VFOSL_R - P_R \times PRAF_{R,R,C} \times VFOSL_R)]$ (value of debit cap *reallocations*)

 $VRC_R = RC_R \times P_R \times PRAF_{R,R} \times VFOSL_R$ (value of credit *energy* reallocations)

 $+ RCS_R \times (P_R \times PRAF_{R,R} \times VFOSL_R - PCS_R)$ (value of credit swap *reallocations*)

+ Σ_C [RCC_{R,C} X

 $(P_R \times PRAF_{R,R} \times VFOSL_R - P_R \times PRAF_{R,R,C} \times VFOSL_R)]$ (value of credit cap *reallocations*)

where:

Regional Parameters:

GST Represents the applicable rate for the Goods and Services Tax.

P_R Represents AEMO's estimate of the average future RRP for each region R.

SAPSSP_R Represents the current SAPS settlement price for each region R².

T_{OSL} Is the OSL time period, which is 35 days.

VFOSL_R Is a volatility factor, which is a scaling factor specific to the OSL used to achieve the

prudential standard for each region R.

Market Participant Specific Parameters:

OSL_{R,U} Represents the *regional* OSL with full allowance for *regional* volatility.

OSL_{R,I} Represents the *regional* OSL with no allowance for *regional* volatility.

VEL_R Represents the value of *load* for a *Market Participant* in *region* R.

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² For OSL calculations undertaken prior to 30 May 2023, this is a null value



VEG_R	Represents the value of generation for a Market Participant in region R.
VRD_R	Represents the value of debit energy reallocations for a Market Participant in region R.
VRC_R	Represents the value of credit energy reallocations for a Market Participant in region R.
PRAF _{L,R}	Is a Participant Risk Adjustment Factor (<i>load</i>) used to adjust the OSL and PM for a <i>Market Participant</i> to reflect their relative <i>load</i> risk and achieve the <i>prudential standard</i> in <i>region</i> R for the <i>Market Participant</i> .
$PRAF_{G,R}$	Is a Participant Risk Adjustment Factor (<i>generation</i>) used to adjust the OSL and PM for a participant to reflect their relative <i>generation</i> risk and achieve the <i>prudential standard</i> in <i>region</i> R for the <i>Market Participant</i> .
PRAF _{R,R}	Is a Participant Risk Adjustment Factor (energy and swap reallocations) used to adjust the OSL and PM for a <i>Market Participant</i> to reflect their relative energy and swap reallocation risk and achieve the <i>prudential standard</i> in <i>region</i> R for the <i>Market Participant</i> .
PRAF _{R,R,C}	Is a Participant Risk Adjustment Factor (cap reallocations) for a cap value of C used to adjust the OSL and <i>PM</i> for a <i>Market Participant</i> to reflect their relative risk of cap <i>reallocations</i> and achieve the <i>prudential standard</i> in <i>region</i> R for the <i>Market Participant</i> .
EL _R	Represents AEMO's estimate of the Market Participant's average daily load in region R.
EL _{RS}	Represents $AEMO$'s estimate of the $Market\ Participant$'s average daily $load$ in a $regulated\ SAPS$ in $region\ R^3$.
EG_R	Represents AEMO's estimate of the Market Participant's average daily generation in region R.
EG _{RS}	Represents AEMO's estimate of the Market Participant's average daily generation in a regulated SAPS in region R ⁴ .
RC_R	Represents the average daily <i>energy</i> of ex ante energy <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.
RD_R	Represents the average daily <i>energy</i> of ex ante energy <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.
RCS_R	Represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.
RDS_R	Represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.
PCS _R	Represents the swap energy-weighted average strike price for ex ante swap <i>reallocation</i> transactions for which the <i>Market Participant</i> is the credit party in <i>region</i> R.
PDS_R	Represents the swap energy-weighted average strike price for ex ante swap <i>reallocation</i> transactions for which the <i>Market Participant</i> is the debit party in <i>region</i> R.
$RCC_{R,C}$	Represents the average daily <i>energy</i> of ex ante cap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the credit party, for a cap value C in <i>region</i> R.
$RDC_{R,C}$	Represents the average daily <i>energy</i> of ex ante cap reallocation transactions for which the <i>Market Participant</i> is the debit party, for a cap value C in <i>region</i> R.
RC\$ _R	Represents the average daily dollar amount of ex ante dollar <i>reallocation transactions</i> for which the <i>Market Participant</i> is the credit party, in <i>region</i> R.

 $^{^{\}rm 3}$ For OSL calculations undertaken prior to 30 May 2023, this is a null value. $^{\rm 4}$ For OSL calculations undertaken prior to 30 May 2023, this is a null value.



RD\$_R Represents the average daily dollar amount of ex ante dollar *reallocation transactions* for which the *Market Participant* is the debit party, in *region* R.

The calculated value is rounded in accordance with clause 10.1.

Detailed definitions of each term are provided in clause 9.



6. THE PRUDENTIAL MARGIN CALCULATION

The PM calculation is represented by:

 $PM = PM_I \text{ or } PM_F$ (either PM Limited Offset (PM_L) or PM Full Offset (PM_F)) $PM_{L} = MAX \left[\Sigma_{R} (PM_{R,E}), 0 \right] + MAX \left[\Sigma_{R} (PM_{R,R}), 0 \right]$ (PM Limited Offset) $PM_F = MAX [\sum_R MAX(PM_{R,U}, PM_{R,I}), 0]$ (PM Full Offset) $PM_{R,E} = MAX [(VEL_R - VEG_R) \times T_{RP}, (VEL_R - VEG_R) \times T_{RP} / VFPM_R]$ $PM_{R,R} = MAX [(VRD_R - VRC_R + RD\$_R - RC\$_R) \times T_{RP},$ $(VRD_R - VRC_R) / VFPM_R \times T_{RP} + (RD\$_R - RC\$_R) \times T_{RP}$ $PM_{R,U} = (VEL_R + VRD_R + RD\$_R) \times T_{RP}$ (PM increased by debit) $-(VEG_R + VRC_R + RC\$_R) \times T_{RP}$ (PM decreased by credit) $PM_{R,I} = (VEL_R + VRD_R) \times T_{RP} / VFPM_R$ $-(VEG_R + VRC_R) \times T_{RP} / VFPM_R$ + $(RD\$_R - RC\$_R) \times T_{RP}$ $VEL_R = ((EL_R \times P_R \times PRAF_{L,R} \times VFPM_R + (EL_{RS} \times SAPSSP_R)) \times (GST + 1)$ (value of energy *load*) $VEG_R = ((EG_R \times P_R \times PRAF_{G,R} \times VFPM_R + (EG_{RS} \times SAPSSP_R)) \times (GST + 1)$ (value of energy *generation*) $VRD_R = RD_R \times P_R \times PRAF_{R,R} \times VFPM_R$ (value of debit energy *reallocations*) + RDS_R x (P_R x PRAF_{R,R} x VFPM_R- PDS_R) (value of debit swap reallocations) + Σ_{C} [RDC_{R.C} x $(P_R \times PRAF_{R,R} \times VFPM_R - P_R \times PRAF_{R,R,C} \times VFPM_R)]$ (value of debit cap reallocations) $VRC_R = RC_R \times P_R \times PRAF_{R,R} \times VFPM_R$ (value of credit energy *reallocations*) + RCS_R x (P_R x PRAF_{R,R} x VFPM_R - PCS_R) (value of credit swap reallocations) + Σ_{C} [RCC_{R,C} x $(P_R \times PRAF_{R,R} \times VFPM_R - P_R \times PRAF_{R,R,C} \times VFPM_R)]$ (value of credit cap reallocations)

Where:

Regional Parameters:

GST Represents the applicable rate for the Goods and Services Tax.

P_R Represents AEMO's estimate of the average future RRP for each region R.

SAPSSP_R Represents the current SAPS settlement price for each region R⁵.

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⁵ For PM calculations undertaken prior to 30 May 2023, this is a null value



T_RP			even days	

VFPM $_{R}$ Is a volatility factor, which is a scaling factor specific to the PM used to achieve the *prudential* standard for each region R.

Market Participant Specific Parameters:

PM_{R,E} Represents the value of *energy* in the *regional* PM with no allowance for *regional volatility* on net credit amounts.

PM_{R,R} Represents the value of *reallocations* in the *regional* PM with no allowance for *regional volatility* on net credit amounts.

PM_{R,U} Represents the *regional* PM (full offset) with full allowance for *regional* volatility.

PM_{R,I} Represents the *regional* PM with no allowance for *regional* volatility.

VEL_R Represents the value of *load* for a *Market Participant* in *region* R.

VEG_R Represents the value of *generation* for a *Market Participant* in *region* R.

VRD_R Represents the value of debit energy *reallocations* for a *Market Participant* in *region* R.

VRC_R Represents the value of credit energy *reallocations* for a *Market Participant* in *region* R.

PRAF_{L,R} Is a Participant Risk Adjustment Factor (*load*) used to adjust the OSL and PM for a *Market Participant* to reflect their relative *load* risk and achieve the *prudential standard* in *region* R for the *Market Participant*.

PRAF_{G,R} is a Participant Risk Adjustment Factor (generation) used to adjust the OSL and PM for a Market Participant to reflect their relative generation risk and achieve the prudential standard in region R for the Market Participant.

PRAF_{R,R} is a Participant Risk Adjustment Factor (energy and swap reallocations) used to adjust the OSL and PM for a *Market Participant* to reflect their relative energy and swap reallocation risk and achieve the *prudential standard* in *region* R for the *Market Participant*.

PRAF_{R,R,C} is a Participant Risk Adjustment Factor (cap reallocations) for a cap value of C used to adjust the OSL and PM for a *Market Participant* to reflect their relative risk of cap *reallocations* and achieve the *prudential standard* in *region* R for the *Market Participant*.

EL_R represents AEMO's estimate of the Market Participant's average daily load in region R.

EL_{RS} Represents *AEMO*'s estimate of the *Market Participant*'s average daily *load* in a *regulated SAPS* in *region* R⁶.

EG_R represents AEMO's estimate of the Market Participant's average daily generation in region R.

EG_{RS} Represents AEMO's estimate of the Market Participant's average daily generation in a regulated SAPS in region R^7 .

RC_R represents the average daily *energy* of ex ante energy *reallocation transactions*, for which the *Market Participant* is the credit party in *region* R.

RD_R represents the average daily *energy* of ex ante energy *reallocation transactions* for which the *Market Participant* is the debit party in *region* R.

⁶ For PM calculations undertaken prior to 30 May 2023, this is a null value

⁷ For PM calculations undertaken prior to 30 May 2023, this is a null value



RCS_R	represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.		
RDS_R	represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.		
PCS _R	represents the swap energy-weighted average strike price for ex ante swap <i>reallocation</i> transactions for which the Market Participant is the credit party in region R.		
PDS_R	represents the swap energy-weighted average strike price for ex ante swap reallocation transactions for which the Market Participant is the debit party in region R.		
$RCC_{R,C}$	represents the average daily <i>energy</i> of ex ante cap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the credit party, for a cap value C in <i>region</i> R.		
$RDC_{R,C}$	represents the average daily <i>energy</i> of ex ante cap reallocation transactions for which the <i>Market Participant</i> is the debit party, for a cap value C in <i>region</i> R.		
RC\$ _R	represents the average daily dollar amount of ex ante dollar <i>reallocation transactions</i> for which the <i>Market Participant</i> is the credit party, in <i>region</i> R.		
RD\$ _R	represents the average daily dollar amount of ex ante dollar <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party, in <i>region</i> R.		
The calculated value is rounded in accordance with clause 10.1.			

Detailed definitions of each term are provided in clause 9.



7. THE TYPICAL ACCRUAL

A *typical accrual* amount is calculated for the purposes of determining a *call amount* under NER clause 3.3.11(a)(2), for all *Market Participants* except MNSPs and DRSPs. As it is not feasible to determine a *typical accrual* for an MNSP or a DRSP, the *call amount* for these Market Participants will always be determined as (*outstandings* – *trading limit*), as defined in that clause.

It is assumed that under typical conditions cap and floor reallocations will not take effect.

The typical accrual calculation is represented by:

 $TA = DTA \times T$

 $DTA = \Sigma_R DTA_R$ (daily typical accrual)

 $DTA_R = ((EL_R \times P_R) + (EL_{RS} \times SAPSSP_R)) \times (GST + 1)$

 $-((EG_R \times P_R) + (EG_{RS} \times SAPSSP_R)) \times (GST + 1)$

 $+ RD_R x P_R$

 $-RC_R \times P_R$

+ RDS_R x (P_R- PDS_R)

 $-RCS_R \times (P_R - PCS_R)$

+ $(RD\$_R - RC\$_R)$

(typical daily value of energy *load*)

(typical daily value of energy *generation*)

(typical daily value of debit energy reallocations)

(typical daily value of credit energy *reallocations*)

(typical daily value of debit swap reallocations)

(typical daily value of credit swap reallocations)

(typical daily net value of dollar reallocations)

Where:

Regional Parameters:

GST Represents the applicable rate for the Goods and Services Tax.

P_R Represents AEMO's estimate of the average future RRP for each region R.

SAPSSP_R Represents the current SAPS settlement price for each region R⁸.

T Is the number of days over which the corresponding *outstandings* are calculated.

Market Participant Specific Parameters

EL_R Represents AEMO's estimate of the Market Participant's average daily load in region R.

EL_{RS} Represents AEMO's estimate of the Market Participant's average daily load in a regulated

SAPS in region R⁹.

EG_R Represents AEMO's estimate of the Market Participant's average daily generation in region R.

EG_{RS} Represents AEMO's estimate of the Market Participant's average daily generation in a

regulated SAPS in region R^{10} .

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⁸ For TA calculations undertaken prior to 30 May 2023, this is a null value

⁹ For TA calculations undertaken prior to 30 May 2023, this is a null value

¹⁰ For TA calculations undertaken prior to 30 May 2023, this is a null value



RC_R	Represents the average daily <i>energy</i> of ex ante energy <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.	
RD_R	Represents the average daily <i>energy</i> of ex ante energy <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.	
RCS_R	Represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.	
RDS _R	Represents the average daily <i>energy</i> of ex ante swap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.	
PCS_R	Represents the swap energy-weighted average strike price for ex ante swap <i>reallocation</i> transactions for which the <i>Market Participant</i> is the credit party in <i>region</i> R.	
PDS_R	Represents the swap energy-weighted average strike price for ex ante swap <i>reallocation</i> transactions for which the <i>Market Participant</i> is the debit party in <i>region</i> R.	
Detailed definitions of each term are provided in clause 9.		



8. CALCULATION OF PARTICIPANT RISK ADJUSTMENT FACTOR

Participant Risk Adjustment Factor (PRAF) is a *Market Participant* specific factor calculated by *AEMO* and used to adjust the PM and OSL for a *Market Participant* to reflect their relative risk.

A separate PRAF is calculated for a *Market Participant's load, generation*, energy and swap *reallocations* and cap *reallocations*.

The PRAFs are based on the following calculations:

 $PRAF_{LR} = MAX[LWPR_{LR},(LWPR_{LR})^{2}]$ (PRAF - load) $PRAF_{G,R} = MAX[LWPR_{G,R},(LWPR_{G,R})^2]$ (PRAF - generation)) $PRAF_{R,R} = MAX[LWPR_{R,R},(LWPR_{R,R})^2]$ (PRAF - energy and swap *reallocations*) $PRAF_{R.R.C} = MAX[LWPR_{R.R.C},(LWPR_{R.R.C})^{2}]$ (PRAF cap *reallocations* for a cap value of C) $LWPR_{LR} = PLWP_R / RLWP_R$ (Load-weighted price ratio - load) $LWPR_{G,R} = PGWP_R / RLWP_R$ (Load-weighted price ratio - generation) $LWPR_{R,R} = PRWP_R / RLWP_R$ (Load-weighted price ratio - energy and swap *reallocations*) $LWPR_{R,R,C} = PLWP_{R,C} / RLWP_{R,C}$ (Load-weighted price ratio - cap *reallocations*) (Market Participant load-weighted price) $PLWP_R = \Sigma_{TI} (P_{TI,R} \times EL_{TI,M,R}) / (\Sigma_{TI} EL_{TI,R})$ (Market Participant generation-weighted price) $PGWP_R = \Sigma_{TI} (P_{TI,R} \times EG_{TI,M,R}) / (\Sigma_{TI} EG_{TI,R})$ $PRWP_{R} = \Sigma_{RI} (P_{TI,R} \times R_{TI,R}) / (\Sigma_{RI} R_{TI,R})$ (Market Participant energy and swap reallocation-weighted price) (Market Participant load-weighted price $PLWP_{R,C} = \Sigma_{TI} (P_{TI,R,C} \times R_{TI,R,C}) / (\Sigma_{TI} R_{TI,R,C})$ cap reallocations) $RLWP_R = \Sigma_{TI} (P_{TLR} \times ERL_{TL/R}) / (\Sigma_{TI} ERL_{TL/R})$ (Regional load-weighted price) $R_{TI,R} = (RD_{TI,R} - RC_{TI,R})$ (Net energy *reallocation* position per TI) + $(RDS_{TI,R} - RCS_{TI,R})$ (Net swap reallocation position per TI) $R_{TI,R,C} = (RDC_{TI,R,C} - RCC_{TI,R,C})$ (Net cap reallocation position per TI for a Cap Value of C) where:

Regional Parameters:

ERL_{TI,R} Represents AEMO's estimate of the expected load per TI for each region R.

P_{TI,R} Represents AEMO's estimate of a future RRP for each region R.

P_{TI,R,C} Represents AEMO's estimate of a capped future RRP for each region R for a cap value of C.

RLWP_R Represents AEMO's estimate of the *regional* load-weighted price in each region R.

RLWP_{R.C} Represents AEMO's estimate of the regional load-weighted capped price in each region R.

Market Participant Specific Parameters:



EL _{TI,M,R}	Represents AEMO's estimate of the Market Participant's load per TI adjusted for marginal loss factors in each region R.
$EG_{TI,M,R}$	Represents AEMO's estimate of the Market Participant's generation per TI adjusted for marginal loss factors in each region R.
EL _{TI,R}	Represents AEMO's estimate of the Market Participant's load per TI in each region R.
EG _{TI,R}	Represents AEMO's estimate of the Market Participant's generation per TI in each region R.
LWPR _{L,R}	Represents AEMO's estimate of the Market Participant's Load-Weighted Price Ratio (load) in region R.
LWPR _{G,R}	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> Load-Weighted Price Ratio (<i>generation</i>) in <i>region</i> R.
LWPR _{R,R}	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> (Load-Weighted Price Ratio (energy and swap <i>reallocations</i>) in <i>region</i> R.
LWPR _{R,R,C}	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> Load-Weighted Price Ratio (cap reallocations) in <i>region</i> R.
PLWP _R	Represents AEMO's estimate of the Market Participant's Participant Load-Weighted Price in region R.
$PGWP_R$	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> Participant Generation-Weighted Price in <i>region</i> R.
PRWP _R	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> Participant Energy and Swap Reallocation-Weighted Price in region R.
PLWP _{R,C}	Represents <i>AEMO's</i> estimate of the <i>Market Participant's</i> Participant Load-Weighted Price Cap Reallocations in <i>region</i> R.
$R_{TI,R}$	Represents AEMO's estimate of the Market Participant's net energy and swap reallocation per TI in each region R.
$R_{TI,R,C}$	Represents AEMO's estimate of the Market Participant's net cap reallocation position per TI for each region R for a cap value of C.
$RC_{TI,R}$	Represents the <i>energy</i> of ex ante energy <i>reallocation transactions</i> per TI for which the <i>Market Participant</i> is the credit party of <i>region</i> R.
$RD_{TI,R}$	Represents the <i>energy</i> per <i>TI</i> of ex ante energy <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.
$RCS_{TI,R}$	Represents the <i>energy</i> per TI of ex ante swap <i>reallocation transactions</i> , for which the <i>Market Participant</i> is the credit party in <i>region</i> R.
$RDS_{TI,R}$	Represents the <i>energy</i> per TI of ex ante swap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the debit party in <i>region</i> R.
$RCC_{TI,R,C}$	Represents the <i>energy</i> per TI of ex ante cap <i>reallocation transactions</i> for which the <i>Market Participant</i> is the credit party, for a cap value C in <i>region</i> R.
$RDC_{TI,R,C}$	Represents the <i>energy</i> of ex ante cap <i>reallocation transactions</i> per TI for which the <i>Market Participant</i> is the debit party, for a cap value C in <i>region</i> R.
Detailed de	finitions of each term are provided in clause 9.



9. DETAILS OF THE OSL AND PM COMPONENTS OF THE MCL

9.1. Adjustment for the introduction and repeal of a carbon price

On 1 July 2012, the *Clean Energy Act 2011* (Commonwealth) was introduced and was subsequently repealed effective from 1 July 2014, to reflect the impact on pricing in of these changes between 1 July 2012 and 30 June 2014 an adjustment was applied to decrease historical RRPs by \$21 per MWh¹¹ for regions on the mainland and \$12 per MWh¹ for Tasmania for each *trading interval*.

9.2. Regional Level Factors

The following factors are calculated at the regional level.

9.2.1. Average daily regional load (ERLR)

- (a) The average daily *regional load* for the region (ERL_R) is *AEMO*'s estimate of the average daily *regional load* for a *region* R to be used as an input for the purposes of achieving the desired *prudential standard* at a *regional* level.
- (b) The ERL_R is calculated by season, using an exponential weighted moving average approach based on the previous value ERL_{R(previous)} and the most recent *regional loads* for that season. The calculation is outlined below:
 - (i) For each season calculate last year's actual average daily *regional load* (AERL_R) using actual daily *regional loads*.
 - (ii) Calculate the current ERL_R

$$ERL_R = ERL_{R(previous)} \times (1 - W_{L,R}) + AERL_R \times W_{L,R}$$

Where:

ERL_{R(previous)} is the previously calculated value of the relevant seasons ERL_R.

 W_{LR} is the weighting factor for average regional loads.

(c) The current value of W_{LR} is 70%. This weighting factor value is derived based on historic analysis of actual *regional loads* and chosen to best fit average *regional loads* with the exponential moving average approach. The weighting factor will be periodically reviewed by *AEMO* and adjusted following consultation with *Market Participants*.

9.2.2. Average price for the region (P_R)

- (a) The average price for the *region* (P_R) is *AEMO's* estimate of the average seasonal RRP expected to prevail for a *region* R for the purposes of the OSL and PM calculation only. The estimated RRP will be the same for all *Market Participants* in that *region*.
- (b) The P_R is calculated by season using an exponential weighted moving average approach based on the previous value $P_{R(previous)}$ and the most recent RRPs for that season. The calculation is outlined below:
 - (i) For each season calculate last year's actual average price (AP_R) using actual RRP.
 - (ii) Calculate the current P_R:

$$P_R = P_{R(previous)} x (1 - W_{P,R}) + AP_R x W_{P,R}$$

Where:

-

¹¹ This is AEMO's estimate of the direct impact of the carbon price from 1 July 2012 until 30 June 2014.



P_{R(previous)} is the previously calculated value of the relevant season's P_R.

 $W_{P,R}$ is the weighting factor for average prices.

- (iii) Where the change in the P_R from one season to the corresponding season in the following year is more than 20%, then the change in the value of P_R is restricted to an increase/decrease of +/- 20%.
- (iv) The current value of the W_{P,R} is 20%. The weighting factor value is derived based on historic analysis of actual RRP and chosen to best fit average prices with the exponential moving average approach. The weighting factor is periodically reviewed by *AEMO* and adjusted following consultation with *Market Participants*.
- (c) The change constraint in P_R is designed to increase the stability in the MCL whilst maintaining the 2% POE *prudential standard*.
- (d) Where a new *region* is created, the historical RRPs will be taken from a proxy region as outlined in clause 9.3.6.

9.3. Regional level factors used in calculating OSL and PM

9.3.1. Regional load (ERLTI,R) profile

- (a) The calculation of average *regional loads* per TI (ERL_{TI,R}) for the region is required to determine a *regional load* profile as an input into the PRAF calculation only. The average TI *regional load* profile will be the same for all *Market Participants* in that *region*.
- (b) The $ERL_{TI,R}$ is calculated per TI by season using an exponential weighted moving average approach based on the previous value $ERL_{TI,R}$ (previous) and the most recent regional loads for that TI and season. The calculation is outlined below and repeated for each TI in a day:
 - (i) For each season calculate last year's actual average regional load for the TI (AERLTI,R) using actual TI regional loads.
 - (ii) Calculate the current ERL_{TI,R}:

 $ERL_{TI,R} = ERL_{TI,R(previous)} x (1 - W_{L,R}) + AERL_{TI,R} x W_{L,R}$

Where:

ERL_{TI.R}(previous) is the previously calculated value of the relevant seasons ERL_{TI.R}.

W_{L,R} is the weighting factor for average regional loads (see 9.2.1).

9.3.2. Regional price $(P_{TI,R})$ profile

- (a) The calculation of average prices per TI for the region ($P_{TI,R}$) is required to determine a regional price profile as an input into the PRAF calculations only. The average TI regional price profile will be the same for all $Market\ Participants$ in that region.
- (b) The $P_{TI,R}$ is calculated per TI by season using an exponential weighted moving average approach based on the previous value $P_{TI,R(previous)}$ and the most recent RRPs for that TI and season. The calculation is outlined below and repeated for each TI in a day:
 - (i) For each season, calculate last year's actual average regional price for the TI ($AP_{TI,R}$) using actual RRP.
 - (ii) Calculate the current $P_{TI,R}$:

 $P_{TI,R} = P_{TI,R(previous)} x (1 - W_{P,R}) + AP_{TI,R} x W_{P,R}$



Where:

 $P_{TI,R(previous)}$ is the previously calculated value of the relevant seasons $P_{TI,R}$

W_{P,R} is the same as the weighting factor for average prices (see 9.2.2).

- (iii) Where the change in the $P_{TI,R}$ from one season to the corresponding season in the following year is more than 20%, then the change in the value of $P_{TI,R}$ is restricted to an increase/decrease of +/- 20%.
- (c) The change constraint in P_{TLR} is designed to increase the stability in the PRAF.
- (d) Where a new *region* is created, the historical RRPs will be taken from a proxy *region* as outlined in clause 9.3.6.

9.3.3. Regional price (PTI,R,C) profile for cap value C

- (a) The calculation of average capped prices per TI for the *region* (P_{TI,R,C}) is required to determine a regional price profile as an input into the PRAF calculations for cap *reallocations* only. The average *regional* capped price profile will be the same for all *Market Participants* in that *region*.
- (b) The $P_{TI,R,C}$ is calculated per TI by season using an exponential weighted moving average approach based on the previous value $P_{TI,R,C(previous)}$ and the most recent capped RRPs for that TI and season. The calculation is outlined below and repeated for each TI in a day.
 - (i) For each season calculate last year's actual average price for the TI ($AP_{TI,R,C}$) using actual RRP, but limiting any actual RRP to the cap value C.
 - (ii) Calculate the current P_{TLR.C}

 $P_{TI,R,C} = P_{TI,R,C(previous)} x (1 - W_{P,R}) + AP_{TI,R,C} x W_{P,R}$

Where:

P_{TI,R,C(previous)} is the previously calculated value of the relevant seasons P_{TI,R,C}

 $W_{P,R}$ is the same as the weighting factor for average prices (see 9.2.2).

- (iii) Where the change in the $P_{TI,R,C}$ from one season to the corresponding season in the following year is more than 20%, then the change in the value of $P_{TI,R,C}$ is restricted to an increase of +/- 20%.
- (c) The change constraint in $P_{TLR,C}$ is designed to increase the stability in the PRAF.
- (d) Where a new *region* is created, the historical RRPs will be taken from a proxy *region* as outlined in clause 9.3.6.

9.3.4. Outstandings limit volatility factor (VFOSLR)

- (a) The outstandings limit volatility factor (VFOSL_R) is a number derived from the distribution of estimated *load* by estimated price and is used as an input to a *Market Participant's* OSL. The VFOSL_R is calculated on a *regional* basis.
- (b) The VFOSL_R is calculated by season using an exponential weighted moving average approach based on the previous value VFOSL_{R(previous)} and the most recent RRPs and regional loads for the season. The calculation is outlined below:
 - (i) For each season calculate last year's actual volatility factor (AVFOSL_R) using actual RRP and *regional load*.



- (A) For the relevant season, calculate values of the product of RRP and total *load* in the *region* per *TI*.
- (B) Calculate the sum of these values on a daily basis.
- (C) Using the results of step b, calculate a rolling 35-day average payment for each day within the relevant season. This gives a distribution of the rolling 35-day average daily purchase (RADP).
- (D) Calculate the mean (M) of the distribution RADP.
- (E) Use the relevant percentile value (X) of the distribution RADP required to calibrate the regional level MCL to meet the *prudential standard*.
- (F) Calculate the AVFOSL_R to 1 decimal place, as:
- (G) $AVFOSL_R = X / M$
- (ii) Calculate the current VFOSL_R:

 $VFOSL_R = VFOSL_{R(previous)} \times (1 - W_{VF,R}) + AVFOSL_R \times W_{VF,R}$

Where:

VFOSL_{R(previous)} is the previously calculated value of the relevant season's VFOSL_R.

W_{VF,R} is the weighting factor for volatility factors.

- (iii) Where the change in the VFOSL_R from one season to the corresponding season in the following year is more than 20%, then the change in the value of VFOSL_R is restricted to an increase/decrease of \pm 20%.
- (c) The current value of the W_{VF,R} is 20%. The weighting factor value is derived based on historic analysis of actual VFs and chosen to best fit VFs with the exponential moving average approach. The weighting factor is periodically reviewed by *AEMO* and adjusted following consultation with *Market Participants*
- (d) The change constraint in VFOSL_R is designed to increase stability in the OSL.
- (e) Where a new region is created, the historical RRPs and loads will be taken from a proxy region as outlined in clause 9.3.6.

9.3.5. Prudential margin volatility factor (VFPMR)

- (a) The prudential margin volatility factor VFPM_R is a number derived from the distribution of estimated load by estimated price and is used as an input to a *Market Participant's PM*. The VFPM_R is calculated on a *regional* basis.
- (b) The VFPM_R is calculated by season using an exponential weighted moving average approach based on the previous value VFPM_{R(previous)} and the most recent RRPs and *regional loads* for the season. The calculation is outlined below:
 - (i) For each season calculate last year's actual volatility factor (AVFPM_R) using actual RRP and *regional load*.
 - (A) For the relevant season, calculate values of the product of RRP and total customer *load* per TI in the *region*.
 - (B) Calculate the sum of these values on a daily basis.



- (C) Using the results of step b, calculate a rolling seven-day average payment for each day within the relevant season. This gives a distribution of the rolling seven-day average daily purchase (RADP).
- (D) Calculate the mean (M) of the distribution RADP.
- (E) Use the relevant percentile value (X) of the distribution RADP that has been chosen by AEMO to calibrate the regional level MCL to achieve the desired *prudential standard*.
- (F) Calculate the AVFPM_R to 1 decimal place, as:
- (G) $AVFPM_R = X / M$
- (ii) Calculate the current VFPM_R:

 $VFPM_R = VFPM_{R(previous)} x (1 - W_{VF,R}) + AVFPM_R x W_{VF,R}$

Where:

VFPM_{R(previous)} is the previously calculated value of the relevant season's VFPM_R.

W_{VF,R} is the weighting factor for volatility factors.

- (iii) Where the change in the VFPM $_R$ from one season to the corresponding season in the following year is more than 20%, then the change in the value of VFPM $_R$ is restricted to an increase/decrease of +/- 20%.
- (c) The current value of the weighting factor is 20%. The weighting factor value is derived based on historic analysis of actual VFs and chosen to best fit VFs with the exponential moving average approach. The weighting factor is periodically reviewed by AEMO and adjusted following consultation with Market Participants.
- (d) The change constraint in $VFPM_R$ is designed to increase stability in the PM.
- (e) Where a new *region* is created, the historical RRPs and *loads* will be taken from a proxy *region* as outlined in clause 9.3.6.

9.3.6. Regions with insufficient historical data

- (a) The approach for determining the VFOSL_R and VFPM_R for a *region* with less than 12 months historical data or less than an entire historical like season is to reference the VFOSL_R and VFPM_R for a *region* selected by *AEMO* that has sufficient historical data.
- (b) The selected proxy region would be:
 - (i) For existing *regions* that have been modified by the addition or removal of *connection* points, the existing *region*.
 - (ii) For new regions with no interconnection history, a region with similar electrical size;
 - (iii) For new *regions* with *interconnection* for more than 12 months, the *interconnected* region.
 - (iv) For new regions created by the division of an existing region, the existing region.

Once there is sufficient historical data for a new *region*, (i) is to be applied. The second approach, (ii), would apply to any boundary change that affects *regions*.



9.4. Market Participant specific calculations

The following factors are calculated by AEMO for each Market Participant and are specific to that Market Participant.

9.4.1. Estimated load (ELR), (ELRS)

The estimated *load* (EL_R) for each *Market Participant* is a positive *energy* amount that represents the estimated value of the *Market Participant*'s average daily *load* within *region* R for each season. The average daily *load* is estimated by reference to historical *loads* and evident trends in the *Market Participant*'s usage patterns. AEMO may take into consideration information from the Market Participant when estimating this value. For new *Market Participants*, the estimate will be agreed between *AEMO* and the *Market Participant* using any relevant information available.

The estimated *load* in a regulated SAPS (EL_{RS}) is the estimated value of the *Market Participant's* average daily *load* in a regulated SAPS within *region* R for each season, estimated on the same basis as described above.

9.4.2. Estimated load per TI (ELTI,R), (ELTI,M,R)

The estimated *load* (EL_{TI,R}) and the *estimated load* (EL_{TI,M,R}) adjusted for marginal loss factors for each *Market Participant* is a positive *energy* amount that represents the estimated value of the *Market Participant*'s *load* per TI within *region* R for each season. The *load* per TI is estimated by reference to historical *load patterns*. For new *Market Participants*, the estimate will be agreed between *AEMO* and the *Market Participant* using any relevant information available.

9.4.3. Estimated generation (EG_R), (EG_{RS})

- (a) The estimated *generation* (EG_R) for each *Market Participant* is a positive *energy* amount that represents the estimated value of average daily sent-out *generation* within *region* R for each season. The average daily sent-out *generation* is estimated based on historical *generation* patterns. AEMO may take into consideration information from the *Market Participant* when estimating this value. For new *Market Participants*, the estimate will be agreed between *AEMO* and the *Market Participant* using any relevant information available.
- (b) To maintain the *prudential standard*, where a *Market Participant's generating units* exhibit material variations in *generation* levels between two or more 35 day OSL time periods (T_{OSL}) in the previous twelve months, AEMO may estimate daily generation commensurate with a T_{OSL} period corresponding to a lower generation level.
- (c) In selecting the T_{OSL} period for estimation purposes under paragraph (b), AEMO must take into account any clear seasonal patterns in the levels of *generation* from the relevant *generating units*.
- (d) The estimated *generation* in a regulated SAPS (EG_{RS}) is the estimated value of average daily sent-out *generation* in a regulated SAPS within *region* R for each season, estimated on the same basis as described in (a) to (c) above.

9.4.4. Estimated generation per TI (EG_{TI,R}), (EG_{TI,M,R})

The estimated generation (EG_{TI,R}) and the estimated generation (EG_{TI,M,R}) adjusted for marginal loss factors for each Market Participant is a positive energy amount that represents the estimated value of TI sent-out generation within region R for each season. The sent-out generation per TI is estimated based on historical generation patterns. For new Market Participants, the estimate will be agreed between AEMO and the Market Participant using any relevant information available



9.4.5. Reallocation amounts (RC_R/RD_R), (RCS_R/RDS_R), (PCS_R/PCS_R), (RCC_{R,C}/RDC_{R,C}), (RC\$_R/RD\$_R)

- (a) Clause 3.3.8 of the NER requires that OSLs and PMs are determined after taking into account the effect of *reallocations*. Substantial *reallocation*, *load* or both by a *Market Generator* (at a level approaching the estimated value of *energy* sales) can lead to its MCL being assessed at a value greater than zero.
- (b) The reallocation energy credit/debit (RC_R/RD_R) for each Market Participant is a positive energy amount that represents the estimated average daily energy of ex ante energy reallocation requests (i.e. do not specify a strike price) in the immediate future for which the Market Participant is the credit/debit party respectively, for region R.
- (c) The *reallocation* swap energy credit/debit (RCS_R/RDS_R) for each *Market Participant* is a positive *energy* amount that represents the estimated average daily *energy* of ex ante swap *reallocation* requests in the immediate future for which the *Market Participant* is the credit/debit party respectively, for *region* R.
- (d) The reallocation swap price credit/debit (PCS_R/PDS_R) for each *Market Participant* is a positive dollar amount that represents the estimated swap energy-weighted average strike price of ex ante swap *reallocation* requests in the immediate future for which the *Market Participant* is the credit/debit party respectively, for *region* R.
- (e) The reallocation cap energy credit/debit ($RCC_{R,C}/RDC_{R,C}$) for each Market Participant is a positive energy amount that represents the estimated average daily energy of ex ante cap reallocation requests in the immediate future for which the Market Participant is the credit/debit party respectively, for region R and a cap value C.
- (f) For the purposes of simplifying the calculation, a number of predefined cap values will be chosen, aligned with the cap values of cap *reallocations* that have been registered (initial values were \$100, \$200 and \$300). If a cap *reallocation request* has a strike price that does not align with a predefined cap value, it will be included in the next largest cap value. For example, a cap *reallocation* with an average strike price of \$290 would be included in the \$300 cap value. The predefined cap values will be reviewed during the annual review of the performance of these Procedures against the *prudential standard* detailed in clause 11.
- (g) The *reallocation* dollar credit/debit (RC\$_R/RD\$_R) for each *Market Participant* is a positive dollar amount that represents the estimated average daily dollar value of all ex ante dollar *reallocation requests* in the immediate future for which the *Market Participant* is the credit/debit party respectively, for *region* R.
- (h) AEMO estimates these average values according to one or more of following:
 - (i) The quantity and type of *reallocations* proposed for up to 4 weeks in the future from the effective date of the review. Credit *reallocation amounts* will be assessed where they meet the requirements in the ex ante timetable for either the PM Full Offset or PM Limited Offset calculation. All ex ante debit *reallocation amounts* will be assessed.
 - (ii) Any sudden changes in *reallocation* patterns for periods in the immediate future, including lower credit *reallocation amounts*, higher debit *reallocation amounts*, or changes in the timing of lodgement and authorisation of *reallocation requests*.
 - (iii) AEMO may consider written advice from Market Participants intending to commence regular ex ante reallocations in determining the values, where the reallocation amounts would increase the MCL.
- (i) Reallocation requests based on floor offsets are not considered in the OSL and PM calculations.



- (j) The *reallocation* PRAFs have been designed to take account of the average daily profile and do not distinguish business and non-business days. Consequently, *reallocation requests* that AEMO considers inconsistent with the average daily valuation approach in these Procedures, for example, where the total of all *reallocations* cover in large part non-business days, may be ignored for the purpose of AEMO's estimation of the average daily *energy* and energy-weighted prices.
- (k) Ex post *reallocations* are not considered in the OSL and PM calculations. A demonstrated history of ex post *reallocations* does not give sufficient confidence that the practice will continue during periods of extreme RRPs. Ex post *reallocations* can assist in management of total outstandings, but not in reducing OSLs. Any large changes in *reallocations* at start of seasons may lead to an MCL transitional issue which will be managed in accordance with clause 9.4.9.

9.4.6. Reallocation amounts per TI (RC_{TI,R}/RD_{TI,R}), (RCS_{TI,R}/RDS_{TI,R}), (RCC_{TI,R,C}/RDC_{TI,R,C})

- (a) The *reallocation* amounts per TI are estimated using an approach consistent with the average daily *reallocation* amounts.
- (b) The *reallocation* energy credit/debit per TI (RC_{TI,R}/RD_{TI,R}) for each *Market Participant* is a positive *energy* amount that represents the estimated *energy* per TI of ex ante energy *reallocation requests* (i.e. do not specify a strike price) in the immediate future for which the *Market Participant* is the credit/debit party respectively, for *region* R.
- (c) The *reallocation* swap energy credit/debit per TI ($RCS_{TI,R}/RDS_{TI,R}$) for each *Market Participant* is a positive energy amount that represents the estimated TI energy of ex ante swap *reallocation requests* in the immediate future for which the *Market Participant* is the credit/debit party respectively, for *region* R.
- (d) The reallocation cap energy credit/debit ($RCC_{TI,R,C}/RDC_{TI,R,C}$) for each Market Participant is a positive energy amount that represents the estimated energy per TI of ex ante cap reallocation requests in the immediate future for which the Market Participant is the credit/debit party respectively, for region R and a cap value C.

9.4.7. Participant Risk Adjustment Factors (PRAFL,R, PRAFG,R, PRAFR,R)

- (a) The Participant Risk Adjustment Factors (PRAF_{L,R} or PRAF_{G,R} or PRAF_{R,R}) are factors derived by *AEMO* using historical data. They are used to reflect the relative risk of *Market Participants'* estimated *load*, *generation* and energy and swap *reallocations* respectively.
- (b) These PRAFs are based on an analysis of the relationship between regional load / generation / energy and swap reallocation profiles, regional prices and historic POE per TI.
- (c) In determining of a *Market Participant's* PRAFs MLF-adjusted *load* and *generation* amounts are used to account for the impact of this variable on each *Market Participant's prudential settings*. Details of the calculation of the PRAFs are given in clause 0.
- (d) The PRAF for each MCL review will be based on data from the previous like season where available and is determined to be representative of the *Market Participant's* current trading behaviour. Where insufficient historical data is available or the *Market Participant's* trading behaviour has changed significantly since the previous like season then a more representative range of historical data may be used. Where no data is available a default PRAF value of 1.05 for load (PRAF_{L,R}) and 0.95 for generation (PRAF_{G,R}) will be applied.



9.4.8. Participant Capped Risk Adjustment Factor (PRAF_{R,R,C})

- (a) The Participant Risk Adjustment Factor (PRAF_{R,R,C}) is a factor derived by *AEMO* using historical data. It is used to reflect the relative risk of *Market Participants'* cap reallocations with capped price.
- (b) The PRAF_{R,R,C} is based on analysis of the relationship between *regional* cap *reallocation* profiles per TI, capped *regional* prices per TI and historic POE. Details of the calculation of the PRAF_{R,R,C} are given in clause 0.

9.4.9. Managing MCL season transition

The potential for OSL breaches is higher than normal where a *Market Participant's* MCL reduces at the start of a new season. Changes in trading activity or high *spot prices* at the end of the previous season can lead to the *Market Participant's outstandings* exceeding its OSL at the start of the new season. If this situation is anticipated, AEMO will seek to discuss options with the *Market Participant* in advance for reducing the risk of a *trading limit* breach on the MCL effective date. If the *Market Participant* cannot prospectively manage its prudential position, AEMO will exercise its discretion to revise the MCL to reflect estimated *outstandings* over the season transition.

10. MAXIMUM CREDIT LIMIT DETERMINATION

The MCL determination for a *Market Participant* is the sum of the OSL and the PM. The MCL is the minimum value of *credit support* that must be lodged with *AEMO* by the *Market Participant*.

10.1. Rounding

- (a) The value of the MCL is determined as the sum of the *Market Participant's* OSL and the *Market Participant's* PM. The MCL and PM can never be less than zero.
- (b) The value of the MCL is then rounded up to the next multiple of \$10,000 for values up to \$250,000 and to the next multiple of \$100,000 for values above \$250,000 so that minor changes in a *Market Participant*'s average purchased *energy*, typically through contestable customer transfers, is unlikely to affect the end result of the MCL determination.
- (c) The value of the PM is rounded up to the nearest \$1,000. The value of the OSL is rounded up to the nearest \$1,000. This is performed to simplify the management of prudential requirements by *Market Participants*.

10.1.1. Maximum Credit Limit for new entrants and inactive Market Participants

- (a) Where a new *Market Participant* registers as a *Market Customer*, *Market Generator* or *Market Small Generation Aggregator* (SGA), *AEMO* will assess the OSL and PM that are to apply from the effective date of registration. *AEMO*'s preference is that this calculation is based on information provided by the applicant, including:
 - (i) expected *load* during the relevant period based on expected customer acquisition and transfer activity;
 - (ii) for *Market Generators* and SGAs, the expected capacity and output of *generating* units being registered, and projected *load* to be consumed during construction and commissioning; and
 - (iii) intention to utilise reallocations to cover part or all of traded energy.



- (b) Where an existing *Market Participant* has been inactive in the *market* for six months or more, for example, because they might be planning to exit the *market*, AEMO may determine both OSL and PM to be zero.
- (c) The following table has been provided as a guide to the nominal OSL and PM values that *AEMO* may determine as part of the assessment of a new *Market Participant* or an inactive *Market Participant*. Individual *Market Participant* calculations may vary.

Participant TYPE	Requirement	OSL ²	PM ¹²
New <i>Market Generator</i> and SGA - not yet generating	Auxiliary/ commissioning load coverage	\$2,000 per 1 MW	\$500 per 1 MW
New <i>Market Customer</i> – planning to acquire customers	3 month growth estimates available	As per clause 5, \$8,000 minimum	As per clause 6, \$2,000 minimum
Existing <i>Market Participant</i> – inactive	6 months inactive trading history available	\$0	\$0

- (d) Where a new active *Market Customer* is not able to provide any data on their expected *load* a default OSL of \$80,000 and PM of \$20,000 may be applied.
- (e) Any new *Market Participant* wishing to have *reallocations* taken into account in its MCL calculation must consult with *AEMO* on its expected *generation* and *load*.

Where a *Market Participant's* actual *load* appears to be significantly greater than that assumed upon registration, an MCL review will be undertaken at the earliest opportunity and a revised MCL issued.

10.2. Maximum Credit Limit for Market Network Service Providers

- (a) The MCL for a MNSP is OSL + PM where, subject to paragraph (b):
 - (i) OSL (for T_{OSL}) is set at the value of the highest unpaid liability accrued by the MNSP in the 12 month period preceding the time of calculation, disregarding the impact of reallocations; and
 - (ii) PM (for T_{RP}) is a value equal to 20% of the OSL.
- (b) The values of OSL and PM will be adjusted to account for any *reallocation transactions* to which the MNSP is a party, by applying the adjustment calculations relating to the values of VRD and VRC, and associated values and terms, in clause 5 (for OSL) and clause 6 (for PM). To avoid doubt, no adjustments are to be made in relation to estimated *load* (VEL) or estimated *generation* (VEG).

10.3. Maximum Credit Limit for Demand Response Service Providers

- (a) The MCL for a DRSP is OSL + PM where, subject to paragraph (b):
 - (i) OSL (for T_{OSL}) is set at the value of \$8000; and
 - (ii) PM (for T_{RP}) is a set at the value of \$2000.

¹² For *Market Generators* and SGAs, OSL assumes 2% house *load*, 24 hours per day for 35 days with a VFOSL_R x P_R of \$75/MWh and PM assumes 2% house *load*, 24 hours per day for 7 days with a VFPM_R x P_R of \$90/MWh for each 1 MW of generating capacity rounded up to the nearest 1 MW.



The values of OSL and PM will be adjusted to account for any *reallocation transactions* to which the DRSP is a party, by applying the adjustment calculations relating to the values of VRD and VRC, and associated values and terms, in clause 5 (for OSL) and clause 6 (for PM). To avoid doubt, no adjustments are to be made in relation to estimated *load* (VEL) or estimated *generation* (VEG).

11. REVIEW OF PROCEDURES AND PRUDENTIAL SETTINGS

11.1. Methodology and calculation factors

Clause 3.3.8(f) of the NER requires that at least once a year *AEMO* must review, prepare and *publish* a report on the effectiveness of the methodology in achieving the objective of these Procedures to ensure the *prudential standard* is met for the NEM, with any recommendations to enhance the methodology. *AEMO* anticipates that the weighting factors and the adjustment factors used in the calculation of *Market Participants'* OSL and PM will be reviewed around every three years under normal market conditions.

11.2. Market Participant prudential settings

- (a) Clause 3.3.8(I) states that *AEMO* must review the *prudential settings* that apply to each *Market Participant* no later than a year after the last determination or review of the *Market Participant*'s prudential settings.
- (b) Clause 3.3.8(m) of the NER allows AEMO at any time, and for any reason that is consistent with the objective of these Procedures in meeting the prudential standard, to change the prudential settings that apply to a Market Participant, provided that any change to the Market Participant's prudential settings applies no earlier than one business day after the date AEMO notifies the Market Participant of changes to its prudential settings.

12. TRADING LIMIT

- (a) A Market Participant may provide credit support in excess of that required following application of these Procedures. Clause 3.3.10 of the NER states that the trading limit for the Market Participant will be determined from the difference between the total value of credit support and the PM. Note that where the PM exceeds the total credit support, the trading limit will be negative.
- (b) The following examples illustrate the *trading limit* in different scenarios (rounding has been ignored):
 - (i) For a Market Customer with credit support = \$100 and PM = \$16, then the trading limit = \$84. The Market Customer must always ensure that the total outstandings is less than \$84 (i.e. their debit position must not exceed \$84).
 - (ii) For a *Market Customer* with *credit support* = \$50 and PM = \$80, then *trading limit* = \$-30. The *Market Customer* must always ensure that the total *outstandings* is more negative than \$-30 (i.e. they must maintain a credit of more than \$30).
 - (iii) For a Market Generator with credit support = \$0 and PM = \$10, then trading limit = \$-10. The Market Generator must always ensure that the total outstandings is more negative than \$-10 (i.e. they must maintain a credit of more than \$10).
- (c) Note that in the above examples, a negative *outstandings* is considered to be a net *settlement* amount owed by *AEMO* to the *Market Participant*.