



ST PASA Generator Recall Workshop - response

Stakeholder submissions

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1. Generator Recall Consultation Submissions

On 5 July 2025, AEMO held a workshop with advising of a proposal to change recall information collected from participants. The change involved three “tranches” of information – short recall, maximum capacity and LOR2/3 capacity. AEMO sought feedback on the proposal by 19 July 2024 and received 8 submissions, all objecting to the proposal. Appendix C summarises these submissions.

1.1. Stakeholder Feedback

AEMO will not be incorporating the additional recall information as part of the development of the ST PASA Procedure. Instead, AEMO is proposing to defer consultation on additional recall tranches to coordinate with the implementation of the ST PASA Replacement Project¹. A summary of the submissions is below.

There was broad support for providing recall times as original proposed by AEMO in the rule change, however, in general stakeholders were not supportive, citing:

- The process to collect this information continuously is onerous and had not been considered by AEMO in its proposal.
- A lack of a cost and benefit analysis.
- Lack of information on how the information is to be used.
- No consideration of impact on other reforms currently underway.
- Inconsistency with the NER and will previous communications from AEMO.

A summary is provided in the table below.

Table 1 Summary of stakeholder feedback on generator recall

Stakeholder	Submission
AGL	Strongly opposed Onerous for traders and site operations Little benefit Current process provided under existing ST PASA rules with extra information provided on request or if there is a change has proven to be effective
Delta	Imposes increased workload on traders who will need to check progress of minor outages and update ST PASA. Information accuracy is generally fleeting during scheduled maintenance outages and could mislead AEMO if incomplete repairs cause breakdowns or lower availability. Opens more channels for inaccurate information.
Energy Australia	Case had not been made to justify more tranches Participants had been anticipating recall data in line with rule change. Require clarity of what is required through, for example, worked examples to illustrate applying the definitions. Timeframe would be very tight. Did not favour proposed CSV solution.
EUAA	Agree there are potential significant benefits moving from 24 hours to every 30 minutes

¹ <https://www.aemo.com.au/initiatives/trials-and-initiatives/st-pasa-replacement-project>

Stakeholder	Submission
	<p>Can't see short, maximum and LOR2/3 will likely have benefits that outweigh costs</p> <p>Significant administrative change will place upward pressure on costs</p> <p>Likely recall times will be the same</p> <p>AEMO needs to demonstrate benefits to consumers</p> <p>AEMO has not described how it intends to incorporate the single time into procedures</p> <p>Concerned high number of LOR events that do not eventuate, want ex-post reviews against actual events, which would help justifying benefits.</p>
Origin	<p>Understand need to revise definitions of recall times, but don't support multiple recall times. Additional complexity, costs, absence of clear benefits.</p> <p>Mandating multiple recall times would create an onerous obligation to implement and manage. Requires restructure of existing bid-files (it will anyway?). At a time when participants are restructuring things anyway. Generator RTS is operationally intensive and there is a degree of uncertainty with actual recall times. New compliance risk and uncertainty, requiring rebids. Reduces utility of the information.</p> <p>Storage - recall time = recall time + time to achieve full charge? Clarify.</p> <p>More practical - single appropriately defined recall time. Intent of rule determination - does not intend to make changes that will place onerous requirements, multiple recall times were not being considered.</p>
Snowy	<p>Concerned with long recall outages - information would not be useful to AEMO.</p> <p>Proposal would add a layer of complexity and compliance risk</p> <p>Delay consideration?</p>
Shell	<p>Support the original proposal</p> <p>Rule change basis was a single recall time</p> <p>Three recall times inconsistent with rule change proposal</p> <p>High probability no differences in recall times</p> <p>Higher compliance risk, not been given due consideration by AEMO</p> <p>Late proposal will add costs where changes are already underway. AER monitoring costs</p> <p>No cost benefit analysis</p> <p>Wants AEMO to return to original rule change determination</p> <p>Unclear how original proposal or how this will reduce high number of false positives</p> <p>Recommend AEMO meet obligations to communicate basis for use of information in ST and PD PASA.</p>
Stanwell	<p>Implementation timeframe rushed given the scope, unclear what is required, suggest review timeframe</p> <p>Go beyond AEMO's proposal, inadequate engagement</p> <p>Will place additional operational burden on participants. However, the proposal may be manageable provided plant is able to deliver MW submitted at the time it will be needed.</p> <p>Did not support inclusion of LOR2 and LOR3 in ST PASA. This is because LOR events may be called at short notice.</p> <p>It was unclear if inclusion of LOR events would restrict the way participants utilise their assets.</p>