



22 April 2014

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Submitted by e-mail: ben.blake@aemo.com.au

Dear Mr Blake

### **First Stage of Rules Consultation - Congestion Information Resource Guidelines**

Origin Energy (Origin) appreciates the opportunity to provide comments to the Australian Energy Market Operator (AEMO) First Stage Rules Consultation on the Congestion Information Resource (CIR) Guidelines.

Origin considers the CIR provides market participants with valuable information critical to enabling participants to operate and manage dispatch risk in the National Electricity Market (NEM). Understanding the interface between a generator and the transmission network is essential to being able to effectively plan around network outages to manage dispatch and market risk. We value the information provided by the CIR and would, therefore, support and encourage measures to improve the quality and timeliness of information contained in the CIR to match stakeholder requirements.

### *AEMO proposal to discontinue the current Quarterly Interconnector Performance Report*

Origin supports AEMO's proposal to discontinue publishing the Quarterly Interconnector Performance Report. The information contained in the Report is generally publically available and can be viewed through a number of software packages. Where AEMO is obliged under the Rules to publish information on interconnector transfer capability and the performance of interconnectors we consider there is an increased benefit in publishing information that may not be otherwise publically available, for example information on constraint binding hours.

Publishing nominal interconnector limits and constraint binding hours that impact interconnector performance in the Monthly Constraint Report and annual NEM Constraint Report could enhance and provide additional benefit to these existing valuable reports. We consider, however, that there should be a clear expectation around the constraints to be included, for example whether the constraint relates to a regional voltage stability limit or an intra-regional thermal limitation. There could also be benefit in including qualitative market information impacting the constraint relating to supply and demand balances.

### *Transmission line diagrams*

Origin understands AEMO publishes single line diagrams of the national transmission network as part of the National Transmission Network Development Plan (NTNDP). Updates to the single line diagrams as part of the NTNDP process currently only occurs annually. Based on the current network diagrams some network augmentations and

developments have been completed but under the current process will not be updated for up to a year after the commissioning of the augmentation.<sup>1</sup>

Origin, therefore, recommends the following:

- The high voltage network diagrams are updated on commissioning of the network augmentation; and
- Approved augmentations be included in the diagrams.

We consider these incremental changes may only impose minimal additional costs on AEMO, if any, and are more likely to relate to a reallocation of resources as updates to the network diagrams are already required.

Having knowledge of when network augmentations have been commissioned would be of benefit to participants. Network augmentations can significantly enhance the capability and performance of the network based on constraint formulation guidelines and therefore have a consequential market impact. We consider a benefit could be provided where this information is provided in a centralised location while acknowledging information on the commissioning of network augmentations is provided in existing periodic reports.

Should you have any questions or wish to discuss this information further, please contact Ashley Kemp on (02) 9503 5061 or [ashley.kemp@originenergy.com.au](mailto:ashley.kemp@originenergy.com.au).

Yours sincerely,



Steve Reid  
Manager - Wholesale Regulatory Policy  
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<sup>1</sup> The duplication of the Cavale-Stanwell line was commissioned in December 2013 but will not be updated until December 2014 under the current process.