



16 December 2024

RE: Draft Congestion Information Resource Guidelines

About Shell Energy in Australia

Shell Energy is Shell's renewables and energy solutions business in Australia, helping its customers to decarbonise and reduce their environmental footprint. Shell Energy delivers business energy solutions and innovation across a portfolio of electricity, gas, environmental products and energy productivity for commercial and industrial customers, while our residential energy retailing business Powershop, acquired in 2022, serves households and small business customers in Australia.

As the second largest electricity provider to commercial and industrial businesses in Australia¹, Shell Energy offers integrated solutions and market-leading² customer satisfaction, built on industry expertise and personalised relationships. The company's generation assets include 662 megawatts of gas-fired peaking power stations in Western Australia and Queensland, supporting the transition to renewables, and the 120 megawatt Gangarri solar energy development in Queensland. Shell Energy also operates the 60MW Riverina Storage System 1 in NSW. Shell Energy Australia Pty Ltd and its subsidiaries trade as Shell Energy, while Powershop Australia Pty Ltd trades as Powershop. Further information about Shell Energy and our operations can be found on our website [here](#).

General Comments

Shell Energy considers that the congestion information resource (CIR) and its associated documents and statistical reporting streams continue to play a critical role for market participants and other stakeholders in the National Electricity Market (NEM). We consider that the contents of the CIR as detailed in the Guideline remains generally fit for purpose and appropriate.

With regards to section 2.4.3, we note that transmission line diagrams published by AEMO have not been updated since April 2019 and are now out of date. This limits their usefulness as reference material detailing network capability. Whilst the transmission annual planning reports published by transmission network service providers (TNSP's) do supply some basic transmission line diagrams, these are not consistent in quality and lack the detail that the AEMO-published transmission line diagrams provided. We recommend that to meet the obligations set out in section 2.4.3 of the Guideline with regards to transmission line diagrams that AEMO update and make available to participants transmission line diagrams of the quality that was previously made available by AEMO to participants. Alternatively, as indicated in our submission to the 2021 CIR Guidelines consultation, AEMO could consider provision to participants of a secure live interactive resource that provides the same level of network detail as that provided in AEMO's control room mimic panel.

Shell Energy supports the decision to commence publication of network outage planning statistics. We note the draft network outage statistics provided in the 2023 annual constraints report which shows that in general less than 3 months notice is routinely provided for the vast majority of non-emergency network outages and for most TNSP's less than 30 days notice is provided for over 90% of non-energy network outages. We consider this to be a sub-optimal outcome for the market as a whole and provides little opportunity for effective and efficient risk

¹By load, based on Shell Energy analysis of publicly available data.

² Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.

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management by participants resulting in increased costs to consumers. We consider that TNSP's should aim for 90% of non-emergency outages to have at least 4 months' notice prior to the outage.

Shell Energy considers that section 3.2.2 would benefit from the addition of a quantitative measure with regards to the impact of network outages which have caused binding constraints or are categorised as high impact outages by AEMO. If this criteria was expected to be met for planned outages, TNSPs should be required to enter the appropriate information into NOS. There are many network outages for which binding constraints can and have occurred with minimal impact on the market, generator output and interconnector transfer. We suggest that an appropriate quantitative criteria would be: an expected impact of 10% on a network flow path's transfer capability or 10% on a generator(s) output capability. We note that currently outages of transmission lines in any of the Yass to Marulan/Bannaby or Canberra - Kangaroo Valley - Dapto - Sydney South flow paths are not included as high impact outages. Given the impacts on generators, interconnector flows and market outcomes associated with outages of transmission lines in these flow paths, we consider their omission as high impact outages questionable. We recommend that AEMO adopt the above quantitative criteria into section 3.2.2 to improve clarity in this section and improve transparency for the market.

We recommend that AEMO reconsider the proposal to remove the requirement to discuss and consider development of the CIR at least annually as part of the NEM's Wholesale Consultative Forum from section 4 of the Guideline. Given AEMO has replaced the NEM's Wholesale Consultative Forum with the NEM Reform Program Consultative Forum, we consider that the best outcome for participants and other stakeholders is to simply replace the NEM's Wholesale Consultative Forum with the NEM Reform Program Consultative Forum in section 4 rather than to simply delete the requirement.

Please contact Peter Wormald (peter.wormald@shellenergy.com.au) to discuss any questions arising from this submission.

Yours sincerely,

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