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EnergyAustralia

LIGHT THE WAY

Australian Energy Market Operator (AEMO)
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ST PASA Procedures and related documents – Consultation paper – 3 September 2024

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts across eastern Australia.

We also own, operate and contract a diversified energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 5,000MW of generation capacity.

We appreciate the consultation that AEMO has undertaken to date on developing its ST PASA procedures in line with new rules requirements, as well as its related Replacement Project.

AEMO's proposed approach in drafting its procedures is broadly to "reflect the content covered by the existing Short Term PASA Process Description, updated to address the information requirements of new NER 3.7.3."¹ Stakeholders made various suggestions to AEMO arising from its 24 July workshop. Appendix C of AEMO's consultation paper suggests it will consider several of these issues separately as part of its Replacement Project, or that it is not proposing major changes to information in this consultation. We have some concerns that if matters are not resolved in developing its procedures now, there will be no further compulsion on AEMO to address them in the future. It may be the case that AEMO is deferring various matters as a matter of expediency and to ensure procedures are in force by 31 July, in line with new rule requirements. If this is AEMO's intention and it agrees that stakeholder suggestions have merit and should eventually be adopted, it should explicitly say so.

AEMO notes that our own request for information on semi-scheduled plant is to be addressed by publishing DUID level data, which is a new rule requirement. For the avoidance of doubt, we are seeking similar information that was suggested by Mercuria, namely technical availability measures and generally the same information as scheduled units in STPASA, MTPASA, PDPASA timeframes. This goes beyond publishing unit level availabilities to understanding AEMO's assumptions about fuel and other inputs, including at a regional level. AEMO's response to this request is that "some of this information is not used for ST PASA and has not been identified in the new rule".² The new PASA Objective states that AEMO should collect and publish information to enable participants to be properly informed and able to make decisions about supply, demand and outages. We do not consider clause 3.7.3(h) is an exhaustive list of matters to be published and

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¹ AEMO, *ST PASA Procedures and related documents - consultation paper*, 3 September 2024, p. 3.

² *ibid.*, p. 21.

provided for in the procedures. Notably, clause 3.7.3(c)(5) provides for AEMO to specify any other information in its procedures, subject to this being of net benefit and in line with the PASA Objective.

AEMO also recently consulted on introducing three tranches of recall times (i.e. short recall, maximum and LOR capacities), however this is not addressed in its consultation paper. As communicated to AEMO, we expect the need to workshop and publish many different worked examples to illustrate how any new definitions should be applied. AEMO should generally explain how these and other issues arising in its Replacement Project will eventually be addressed in procedural revisions.

If you would like to discuss this submission, please contact me on 03 9060 0612 or Lawrence.irlam@energyaustralia.com.au.

Regards

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