



# MERCURIA

COMMODITY MARKETS (ASIA) PTE. LTD.

The STPASA is an important tool, not just for AEMO performing supply adequacy assessments, but also, per the NER, “so that Registered Participants are properly informed to enable them to make decisions about supply, demand and outages”. With the NEM transitioning to a system increasingly reliant on intermittent generation and energy-limited batteries, it is critical that AEMO adapts the STPASA to cater to this – and in doing so pays due consideration to information beneficial to industry participants.

There has long been disparity in provision of, and transparency over, information pertaining to semi-scheduled generators compared to their scheduled counterparts. Mercuria welcomes recent changes to address this, such as the recent publication of INTERMITTENT\_GEN\_SCADA reports containing dispatch/actual PASA-equivalent technical availability (ie the lesser of that informed by registered capacity, uppermwlimit and elementsunavailable) – though note that this was long overdue, and is only next-day public without equivalent dispatch or forward-looking measures. Mercuria requests provision of semi-scheduled PASA-equivalent technical availability:

- At a regional aggregate level, by fuel, across all relevant timeframes (STPASA, PDPASA, MTPASA, as well as DISPATCH, P5MIN and PREDISPATCH)
- On a unit-level basis where provided for scheduled generators – technical/PASA availability, and also “available capacity” ie factored by bid and fuel availability

Whilst STPASA was several years ago augmented to account for energy limits, the information provided on this front is sorely lacking. Only a single daily figure is reported with no direct indication as to which intervals energy is required in, nor how much in those intervals. STPASA is frequently projecting a flat reserve number across multiple hours on an evening, as energy is allocated to maximise the lowest reserve point of a day – if this window period is of greater duration than a facility’s storage duration, which intervals should they be reserving themselves for? Whilst price may provide some hint as to when scarce energy is valuable to the system, this is not a perfect signal and in some circumstances such as impending administered pricing can even give the wrong signals. AEMO should publish energy per interval, split by shorter-duration BDU and longer-duration energy-limited scheduled generators, to inform these participants where their contribution can provide the greatest benefit to the system.

**Should the Procedures include any other information, including any additional ST PASA outputs, not canvassed in the consultation paper? Please outline how any suggested additions would further the PASA objective**

- Contribution to reserve from energy-limited plant, by region, interval, split by BDU/non-BDU (BDU will be batteries/short duration, and non-BDU hydro or thermal generation with less strict limits) – this will assist energy-limited plant to reserve their scarce energy for periods where the system most needs it
- Technical availability measures for semi-scheduled generators by region, interval, split by fuel type (wind/solar) – this would assist in supply and outage planning, and over the longer term improve understanding of outage patterns which can then be accounted for in operational, analysis, modelling and trading activities of market participants
- DUID-level data for semi-scheduled generators to match that of scheduled generators – ie forthcoming DUID-level PASA/MAXAVAIL reporting. Semi-scheduled PASA equivalent would be technical availability (minimum of uppermwlimit or elements(un)available), MAXAVAILABLE would be the former factored by fuel availability and offered availability

**Do participants have any other observations/comments?**

Given the projected build-out of intermittent generation, it is critical that information provision in this area be improved – in principle, any information provided for scheduled generation should also be provided for semi-scheduled generation (and split by fuel ie wind/solar).