



1 October 2024

Daniel Westerman
Chief Executive Officer
Australian Energy Market Operator

Submitted via email: NEMReform@aemo.com.au

Dear Mr Westerman

ST PASA Procedures – Consultation Paper

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Operator's (AEMO) consultation paper on the Short-Term Projected Assessment of System Adequacy (ST PASA) Procedures.

Origin supports the objective of the proposed ST PASA Procedures which is to provide transparency around how AEMO will administer the new ST PASA process. The Procedures are expected to play an important role in helping participants to understand what inputs they will be required to provide, the methodology AEMO will apply and the information that will be published. It is in this context we have provided comments recommending additional clarity on key aspects of the new ST PASA process:

- Energy / cycle limits for bi-directional units (BDU): We understand the Draft ST PASA Procedures and accompanying report will explain the limitations of the ST PASA tool (in particular, to what extent BDU energy limits will be modelled) and are supportive of AEMO providing this information. While the Consultation Paper acknowledges that detailed modelling of the operational patterns of BDUs is not possible, it would be beneficial for AEMO to outline any assumptions that will be made in relation to battery cycling; and for batteries that have warranty limits relating to the number of times they can be cycled, how participants can reflect these limits in PASA submissions.
- Reporting of recall times: It is important AEMO provides additional guidance on how it expects participants to report unit recall times which are less than one hour, noting our understanding from the July workshop is that recall times are only to be reported in hours and not minutes / decimals. For example, are participants expected to round down the recall time submitted if the period is less than 30 minutes?

If you wish to discuss any aspect of this submission further, please contact Thomas Lozanov at thomas.lozanov@originenergy.com.au.

Yours Sincerely,

A handwritten signature in black ink that reads "S Cole".

Shaun Cole
Group Manager, Regulatory Policy