

16 August 2019

The Commissioners
Australian Energy Market Commission

Via Email: jackie.biro@aemc.com.au

Dear Commissioners

RE: Improving Transparency and Extending the Duration of MT PASA – Ref ERC270

The Queensland Electricity Users Network (QEUN) welcomes the opportunity to provide feedback on a rule change request that will improve transparency and extend the duration of the MT PASA.

The QEUN is a consumer advocacy representing small business and residential consumers with a particular emphasis on regional consumers. We advocate that the pace of the transition to a renewable energy future should not be at the expense of the economy, jobs or reasonable living standards.

The QEUN supports all three aspects of the consolidated rule change request proposed by ERM Power as it seeks to:

- Improve transparency and accuracy of generation availability data through the provision of individual generator availability data, the inclusion of committed generation in the MT PASA process and additional information on unplanned generator outages
- Improve transparency and accuracy of demand forecasts through requiring AEMO to publish an additional demand forecast, increasing the frequency of demand forecast updates and simplifying the format of published demand
- Extend the outlook of the MT PASA from two to three years ie market participants would be required to provide information for up to three years ahead while AEMO would be required to forecast information and run the MT PASA process up to three years ahead

The inclusion of a wider data set (eg committed generation) and an extension of the MT PASA to 3 years will improve the robustness and accuracy of the MT PASA. This is of paramount interest to consumers as it is consumers that wear the cost of RERT and unplanned outages. Forewarned is forearmed, therefore MT PASA data is a valuable planning resource for consumers as well as AEMO, retailers and generators.

We note that the rule change request is silent on the current inability of consumers to access MT PASA data. Previously MT PASA data was available on AEMO's website in a consumer friendly graph format on their Data Dashboard. However, since AEMO completed the MT PASA redevelopment project in 2018, the MT PASA data is now restricted to market participants only. This is ironic as it is consumers that suffer the financial, physical and emotional consequences of unserved energy. We understand that the current MT PASA graphs could be alarming to uninformed consumers. However, by denying the MT PASA data to all consumers this also excludes access to the data by informed consumer advocates that assist AEMO with demand forecasts. Consideration needs to be given as to how AEMO allows and publicly presents MT PASA data to consumers. In the current situation where the Retailer Reliability Obligation could be triggered by the release of the ESOO in August, consumers need to be alert but not alarmed by the MT PASA. Whilst we support the rule change request proposed by ERM Power, we also support the provision of MT PASA data to informed consumer advocates that assist AEMO with their demand forecasts.

Yours faithfully

A handwritten signature in blue ink that reads 'Jennifer Brownie'.

Jennifer Brownie
Coordinator