



QUEENSLAND FARMERS' FEDERATION

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Submission

12 September 2019

AEMC
PO Box A2449
Sydney South
NSW 1235

Dear Sir/Madam

Re: Draft Rule Determination: National Electricity Amendment (Transparency of New Projects) Rule 2019

The Queensland Farmers' Federation (QFF) is the united voice of intensive, semi-intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of peak state and national agriculture industry organisations, which in turn collectively represent more than 13,000 farmers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Flowers Australia
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd.

QFF welcomes the opportunity to provide comment on the 'Draft Rule Determination: National Electricity Amendment (Transparency of New Projects) Rule 2019'. We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive, semi-intensive and irrigated agriculture



Background

The Australian Energy Market Commission (AEMC) has released a draft rule to promote a two-way flow of information by allowing AEMO to send system information to different types of developers, while enabling key information about new projects to be shared with AEMO and published on its website.

The Commission's draft rule aims to facilitate greater access to relevant system information for developers that sell grid-scale assets prior to connection, while recognising that existing NER arrangements already enable certain types of developers, to register as intending participants and, as a result, access information available to registered participants. The draft rule will also make more information about new projects more readily available and codifies AEMO's generator information page in the NER, which is an information resource that will provide a source of regularly updated data for registered participants and other interested persons on existing and proposed connections to the national grid.

The rule will require TNSPs (Powerlink, Queensland) to share key connection information about new projects with AEMO. AEMO must then publish this data on the generator information page, increasing the visibility of proposed connections. The draft rule provides better and more up-to-date information about what generation projects are in the pipeline, making it easier and quicker for developers to assess the viability of proposed projects, as the energy market transitions. The draft rule means market participants are better informed, and therefore may make more efficient decisions on where to invest in new generation, which could ultimately benefit consumers by promoting reliable supply at lower costs.

QFF understands that the rule change request from the Australian Energy Council seeks to enhance the publicly available information about large-scale generation projects. QFF previously made a submission to the Consultation Paper - National Electricity Amendment (Transparency of New Projects) Rule in May, fully supporting the amendment (see <https://www.qff.org.au/wp-content/uploads/2017/04/20190522-Submission-to-AEMC-re-Transparency-of-New-Projects-Rule-WEB.pdf>). This submission outlined significant planning and negative impacts occurring around the locality of new generation in Queensland, compounded by the lack of transparency.

In response to the Draft Determination, QFF advises:

- **Information provision to market participants** – *This must support information provision arrangements that involve TNSPs providing key connection information to AEMO to be included on the Generator Information Page provided that information can be provided as soon as practicable and reasonably extend to information received prior to commencement of the rule.*
- **Transitional arrangements – Provision of connection information received prior to commencement** - *There has been a substantial increase of enquiries in the NEM over the last two years (particularly in Queensland) resulting in Powerlink retaining key connection information on a significant number of connection applications received over that period. For the intended benefits of the rule change to be fully realised, the new transparency arrangements need to extend to information obtained by TNSPs prior to the rule commencement date.*
- **Implementation timeframes – commencement of information provision** - *the proposed four (4) month transitional period appears to unnecessarily delay the commencement of new information provision arrangements that are overwhelmingly sought by market participants and limits the potential benefits of increased transparency being realised as soon as possible. QFF supports transitional arrangements that deliver the earlier provision of information. This could be achieved through interim guidelines released on commencement pending final guidelines to be developed later.*

- **Efficiency opportunities** – Recently new TAPR requirements requiring TNSPs to publish aggregated information about new connections in the TAPR should be removed. This would align with the objectives of the Generator Information Page operating as a ‘one stop shop’ for the market including addressing risks of information duplication and potential inconsistencies in detail, potential breaches of confidentiality and would reduce the administrative burden on TNSPs.

Summary

QFF supports the rule change so that from 31 October 2019, developers will be able to access relevant system information under new arrangements; and by 27 February 2020, AEMO will be required to publish its generator information page.

QFF believes that efficient decisions on where to invest in new generation, should benefit consumers by promoting reliable supply at lower costs and reduce future negative impacts on the transmission system. However, it is critical that transparency also applies to the distribution networks (DNSP’s).

If you have any queries about this submission please do not hesitate to contact Dr Georgina Davis at georgina@qff.org.au.

Yours sincerely



Travis Tobin
Chief Executive Officer