ENHANCING INFORMATION ON GENERATOR AVAILABILITY IN MT PASA

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

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| **ORGANISATION:** |       |
| **CONTACT NAME:** |       |
| **EMAIL:** |       |
| **PHONE:** |       |
| **DATE** |       |

project DETAILS

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| **NAME OF RULE CHANGE:** | **Enhancing information on generator availability in MT PASA** |
| **PROJECT CODE:** | **ERC0338** |
| **PROPONENT:** | **Australian Energy Market Operator (AEMO)** |
| **SUBMISSION DUE DATE:** | **3 March 2022** |

**CHAPTER 2** – Assessment framework

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| 1. Do you agree with the proposed assessment framework? Are there additional principles that the Commission should take into account or principles included here that are not relevant?
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**CHAPTER 3.1** – Problem identified in the rule change request

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| 1. **Current arrangements:** What mechanisms or arrangements are in place to address the challenges that are expected to emerge as ageing generators change their operating regimes? Are they sufficient?
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| 1. **Current issue:** Is a lack of information around the availability of NEM generators an issue now?
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| 1. **Future issues:** Will the lack of information around generators moving to more intermittent operating patterns in the future make it more difficult to:
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| * 1. operate the system,
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| * 1. schedule plant maintenance efficiently,
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| * 1. assess opportunities for investment in the market
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| Would having more information about generator’s availability assist in better monitoring future issues e.g. in assisting the AER undertakes its wholesale market monitoring? |       |
| 1. **Stakeholder impact:** Who is impacted by a lack of information around reasons for and recall times from generator unavailability? How are they impacted and by how much?
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| 1. **Varied stakeholder impact:** Does the lack of information around generator availability impact different types of stakeholders in different ways?
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**CHAPTER 3.2** – Solution proposed by the rule change request

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| 1. **Benefits of providing:** What benefits do you see in AEMO having information about the reasons why generators are unavailable and the associated recall times to bring them back online via the MT PASA process?
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| 1. **Costs of providing:** What costs, if any, would you incur to report generating unit status to AEMO through reason codes and recall times via MT PASA?
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| 1. **Other impacts:** What other direct or indirect impacts might the proposed solution have on you or other stakeholders? Include any impacts relating to supporting guidelines and procedures.
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| 1. **Addressing the problem:** Do you think this information may help address the problem identified, that is, uncertainties and challenges to reliability and security that may arise due to lack of information about future generator availability?
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| 1. **Benefits of publishing:** What benefits, if any, do you see in publishing information about the reasons why generating units are unavailable and the associated recall times to bring a unit back online?
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| 1. **Costs of publishing:** Would you incur any costs related to the publication of unit status via reason codes and recall times that would be additional to the costs referred to in question 8?
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| 1. **Concerns with publishing:** Do you have any concerns with the information on unit status being published as part of the MT PASA process? What are these?
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| 1. **Compliance:** Do you think the existing compliance and enforcement frameworks and penalties relating to the information on future generating availability are appropriate for the proposed new information on reasons and recall times?
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| 1. **Alternative options:** Are there alternative solutions to improve the information available around future generator availability to support better reliability and security outcomes as the power system transitions? How would this/these alternatives better meet the NEO than the proposed solution?
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**CHAPTER 3.3** – Implementation considerations

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| 1. **Format:** What format should this information be submitted to AEMO in to best achieve the NEO?
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| 1. **Aligning with other reforms:** If a rule was made, would there be any benefits or cost savings from aligning this reform with the Updating short term PASA rule change implementation, or any other reforms?
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| 1. **Minimising implementation costs:** If a rule was made, are there any other factors the Commission should consider to minimise upfront and ongoing implementation cost on the market?
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| 1. **Varied costs of implementation:** Would implementation costs vary across stakeholders or stakeholder groups (for example, large and small)? If this is the case, what could be done to manage this?
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| 1. **Level of prescription:** If the change was made, what would be the appropriate level of prescription to provide for the collection of reason codes and recall times in the Rules compared to other instruments such as the RSIG and MT PASA process description?
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**OTHER COMMENTS**

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| 1. Do have any other comments to provide that will assist the Commission in assessing this rule change request?
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