

10 February 2022

Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2000

Lodged online at [www.aemc.gov.au](http://www.aemc.gov.au)

### Re: ERC0332 – Updating Short Term PASA

Hydro Tasmania appreciates the opportunity to provide feedback on the AEMC’s Updating Short Term PASA Draft Determination.

The Draft Determination proposes to

- introduces a principles-based approach to ST PASA that is linked to the objective for PASA in clause 3.7.1(b)
- specifies that AEMO must publish forecasts of available capacity and PASA availability for individual generating units
- specifies that ST PASA is published over a seven day period, combining pre-dispatch PASA and short-term PASA
- makes changes to the definition of energy constraint and PASA availability.

**Hydro Tasmania supports the proposed changes to ST PASA set out in the draft determination.** The proposed changes will improve the transparency of participant information, which will enhance dispatch efficiency. Enhanced transparency will be increasingly important as the market transitions with increased penetration of variable renewable energy resources. While Hydro Tasmania supports the AEMC’s draft determination, we have proposed the following modification to further improve the transparency of AEMO’s processes.

#### Proposed modification to the draft determination

The Draft Determination proposes to make changes to the way in which AEMO administers the PASA process. This includes the procedures or methodologies AEMO will apply to produce ST PASA information (clause 3.7.3 of the NER). To ensure maximum visibility and utility for market

participants, Hydro Tasmania proposes modifying clause 3.7.3 (c) (3) as outlined in the Draft Rules. Hydro Tasmania recommends that this clause be expanded by requiring AEMO to publish:

- The mathematical formulation of the SCED optimisation and how it interacts with network analysis tools such as AC optimal power flow, contingency and topological analysis etc.
- That this requirement includes publishing how any uncertainty margins are calculated and the rationale for selecting any probabilities and how this fits in with the reliability standard.

The above information should be published in sufficient detail so that an informed market participant could set up their own models and given the same inputs produce the same results (for example for market participants who utilise a tool like PLEXOS could set up to do model run similar to the ST PASA.)

Please contact John Cooper ([john.cooper@hydro.com.au](mailto:john.cooper@hydro.com.au)) if you would like to discuss this submission further.

Yours sincerely



John Cooper  
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