ECGS Reliability standard and associated settings

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 in considering 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

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

project DETAILS

|  |  |
| --- | --- |
| **NAME OF RULE CHANGE [OR REVIEW]:** | ECGS Reliability standard and associated settings |
| **PROJECT CODE:** | GRC0076 |
| **PROPONENT [DELETE IF NOT APPLICABLE]:** | Energy Senior Officials/Victorian Minister for Energy and Resources |
| **SUBMISSION DUE DATE:** | 17 April 2025 |

**Question 1**

|  |  |
| --- | --- |
| 1. Do you agree with the proponents’ reasons for introducing the tools proposed in this rule change request? |  |
| * 1. Why or why not? |  |
| * 1. Are the proponent’s concerns sufficiently material to support developing the proposed solutions? |  |

**Question 2**

|  |  |
| --- | --- |
| 1. Will the proposed reliability standard effectively address the issues raised by the proponents? |  |
| * 1. Do you consider the proposed dual reliability standard will be effective in promoting more efficient, timely and informed decisions that have regard to the value customers place on reliability? |  |
| * 1. Do you think the proposed form of the dual reliability standard is optimal? |  |
| * 1. Do you consider the proposed governance arrangements are adequate? |  |
| * 1. Do you consider an interim reliability standard (informed by an AEMC-calculated interim VGCR) would be an effective tool until a permanent VGCR and reliability standard are calculated by AER and AEMC respectively? |  |
| * 1. Do you think there are reasons for an alternative reliability standard to apply to any particular jurisdiction (e.g. Northern territory) or type of gas user? |  |

**Question 3**

|  |  |
| --- | --- |
| 1. Will the proposed VGCR effectively address the issues raised by the proponents? |  |
| * 1. Do you consider a VGCR can be estimated in order to inform an ECGS-wide reliability standard that reflects the value different consumers place on reliable gas supply? |  |
| * 1. What challenges and opportunities do you consider the AER will face when calculating a VGCR? |  |
| * 1. What factors should the AER take into account? |  |

**Question 4**

|  |  |
| --- | --- |
| 1. Will the proposed approach to reviewing the market settings effectively address the issues raised by the proponents? |  |
| * 1. Do you consider that the current market settings (STTM and DWGM) need to be informed by a reliability standard? |  |
| * 1. Is it essential for the market settings to use a reliability standard as an input or can the settings be updated directly to reflect a VGCR? |  |
| * 1. Do you consider the proposed governance arrangements are adequate? |  |

**Question 5**

|  |  |
| --- | --- |
| 1. Will the proposed communication tools effectively address the issues raised by the proponents? |  |
| * 1. Do you consider the proposed threat signalling mechanism and GSAR conferences would be effective tools for AEMO to better communicate reliability and supply adequacy threats so that market participants can adequately respond? |  |
| * 1. Do you consider appropriate for the threat level criteria to be set out in AEMO's ECGS procedures? |  |
| * 1. Could a LOR framework for the ECGS allow AEMO to more objectively issue escalating threat signals to market participants without the need for a reliability standard? |  |

**Question 6**

|  |  |
| --- | --- |
| 1. Will the proposed reliability forecast and or the system resilience risk assessment effectively address the issues raised by the proponents? |  |
| * 1. Do you consider the proposed reliability forecast and/or the system resilience risk assessment will be effective in facilitating more informed and efficient planning and investment decisions across the ECGS? |  |
| * 1. Do you consider a reliability standard would materially improve the GSOO and the VGPR forecasts and risk assessments? Could other proposed tools (e.g. VGCR) inform those assessments more directly? |  |

**Question 7**

|  |  |
| --- | --- |
| 1. What are your views on the expected benefits and costs of the proposed solution? |  |
| * 1. Do you agree with the expected benefits identified in the rule change request? Are there other benefits that may arise to ECGS participants and gas users or are relevant to some specific proposed tools included in this rule change request? |  |
| * 1. Do you agree with the expected costs identified in the rule change request? Are there other costs that may arise to ECGS participants and gas users or are relevant to some specific proposed tools included in this rule change request? |  |
| * 1. What do you consider will be the costs and benefits of the proposed solution in both the short/medium-term and longer-term? |  |
| * 1. Are there different design approaches to any of the proposed reliability tools that could assist in improving benefits or reducing costs? |  |

**Question 8**

|  |  |
| --- | --- |
| 1. Are there alternative solutions? |  |
| * 1. Do you consider variations or alternatives to the proposed solutions could solve the issues being represented by the proponents? |  |

**Question 9**

|  |  |
| --- | --- |
| 1. Assessment Framework |  |
| * 1. Do you agree with the proposed key assessment criteria? |  |
| * 1. Are there additional criteria that the Commission should consider, or criteria included here that are not relevant? |  |

**OTHER COMMENTS**

|  |  |
| --- | --- |
| 1. Information on additional issues |  |