



8 May 2025

Australian Energy Market Commission (AEMC)

Via AEMC website: [www.aemc.gov.au](http://www.aemc.gov.au)

### **National Gas Amendment (ECGS Projected Assessment of System Adequacy) Rule**

Alinta Energy welcomes the opportunity to provide feedback on the consultation paper regarding the proposed ECGS projected assessment of system adequacy rule.

Alinta Energy is generally supportive of the overall aim of the proposed rule in the interest of improving intra-year information in the ECGS, provided the PASA regime can make use of existing reporting requirements and substantially avoid imposing further requirements and changing current exemption arrangements. We also support duplicative requirements being removed, including the removal of the ECGS seven day forecast obligation on Part 27 retailers and Bulletin Board large user facilities.

Alinta Energy considers that existing reporting requirements on the gas industry provide the necessary underlying information to create a gas PASA. The gas industry has experienced a massive increase in regulatory burden relating to transparency in recent years and the costs associated with this are having a material impact on the cost of gas to consumers. Compliance with current reporting requirements are comprehensive and time-consuming: additional rules may serve to add further burden on participants without necessarily providing the benefits sought by the proposed rule change.

We broadly support AEMO's proposed implementation approach as outlined in Table 1 of AEMO's [assessment of the requirements for a short and medium term PASA](#), provided the proposed "enhancements" to the provision of non-GPG demand do not substantially increase the burden on participants.

We support the proposal for AEMO to be responsible for the GPG forecast.

In terms of the 'supply capacity' input, we consider that the requirement for daily figures may be excessive and would prefer for updates to be on an ad hoc, as required basis.

In terms of delineating regions, we support the North/South proposal for its simplicity.

We support the proposal for LNG exporters to provide a daily demand forecast out to 12 months, to inform the MT PASA and ST PASA.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please get in touch with Isidora Stefanovic at [isidora.stefanovic@alintaenergy.com.au](mailto:isidora.stefanovic@alintaenergy.com.au).

Yours sincerely,

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