

12 May 2025

Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000
Email: submissions@aemc.gov.au

RE: PROPOSED PROJECTED ASSESSMENT OF SYSTEM ADEQUACY RULE CHANGES

Australian Energy Producers welcomes the opportunity to provide feedback on the proposed new forecasts of projected reliability and supply adequacy (PASA) for the east coast gas market.

Australian east coast gas producers face significant reporting requirements from a range of Federal and State departments and agencies. Cumulatively, these monitoring and reporting actions represent a significant and growing administrative burden.

In this context, Australian Energy Producers recommends:

- The Governments should prioritise actions to bring on the new gas supply needed to address forecast gas shortfalls ahead of implementing new reporting requirements and undertaking additional analysis of the east coast gas market. The challenges facing the east coast gas market are already well understood.
- Any PASA reforms should be based on data that is already collected by the Australian Energy Market Operator or other government agencies and not add to, or duplicate, existing reporting requirements as is proposed.
- All data currently reported under Part 27 and published in aggregate only must remain so. Any changes to this reporting process, including moving the reporting outside Part 27 and/or reporting the data in a disaggregated way, poses serious risks to the commercial sensitivity of the data provided.

Australian Energy Producers remains open to inputting further as required.

Yours sincerely,



Samantha McCulloch
Chief Executive