



Your ref: GRC0080

8 May 2025

Mr Stuart Norgrove
Project Lead, East Coast Gas System
Projected Assessment of System Adequacy
Australian Energy Market Commission
Submitted online at: www.aemc.gov.au

Dear Mr Norgrove

Submission: East Coast Gas System – Projected Assessment of System Adequacy

CS Energy welcomes the opportunity to provide a submission to the Australian Energy Market Commission's consultation paper on proposed *National Gas Rules (NGR)* for Short and Medium Term Projected Assessments of System Adequacy (**ST** and **MT PASA**) for the East Coast Gas System (**ECGS**).

About CS Energy

CS Energy is a Queensland-owned and based energy company that provides power to some of the State's biggest industries and employers. We generate and sell electricity in the wholesale and retail markets, and we employ almost 700 people who live and work in the regions where we operate

CS Energy owns thermal power generation assets, and we are building a more diverse portfolio. We also have a renewable energy offtakes portfolio of almost 300 megawatts, which we supply to our large commercial and industrial customers in Queensland. CS Energy is developing a 400 MW gas-fired peaking generator at Brigalow near Kogan Creek in Queensland.

Key recommendations

CS Energy supports in-principle the introduction of ST and MT PASA for the ECGS. The ECGS' connectedness with the National Electricity Market will deepen with the substantial investment in gas-fired generating plant needed to maintain reliable and secure electricity supplies as use of weather dependent wind and solar plant increases. It will be very useful for gas-fired generators to have consolidated information about the short to medium term outlook for gas supplies. It is proposed that the ST PASA provide a 7 day outlook updated daily and that MT PASA provide a 12 month outlook updated weekly.

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New information provision requirements are a major contributor to the rising compliance costs borne by the industry. Even a policy or regulatory intervention well-justified in principle should minimise the associated compliance costs, not least to maximise the overall benefit. CS Energy therefore welcomes the expressed intention for the ECGS PASA to be developed using existing data and to minimise duplication. The design also should avoid introducing requirements that vary slightly and unnecessarily from existing data requirements. Such requirements impose considerable administrative burdens on businesses and increase their compliance risk while delivering no benefit to consumers or regulators.

It is essential, if an ECGS PASA is introduced, the Australian Energy Market Operator (**AEMO**) consult on its proposed PASA methodology so industry can advise it whether that methodology will produce an ECGS PASA of use to gas consumers. The consultation process must enable thorough discussion among users and between them and AEMO. This process will help identify the type and granularity of information likely to deliver the greatest benefit at the least cost.

If you would like to discuss this submission, please contact Don Woodrow, Market Policy Manager, on either 0407 296 047 or dwoodrow@csenergy.com.au.

Yours sincerely



Dr Alison Demaria
Head of Policy and Regulation