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EnergyAustralia
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AEMC Consultation - ECGS Pasa Rule change

EnergyAustralia is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts across eastern Australia. We also own, operate and contract a diversified energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 5,000MW of generation capacity.

We appreciate the opportunity to comment on the AEMC's consultation on the proposed introduction of a Short-Term (ST) and Medium-Term (MT) PASA for the East Coast Gas System (ECGS). We support the underlying objective of improving visibility of supply adequacy and reliability risks. The proposed ST PASA (7-day rolling forecast) and MT PASA design (weekly 12-month rolling forecast) underpinned by a principles-based framework, appear broadly appropriate. **Overall, the gas PASA framework has the potential to serve as a useful transparency tool to help enable timely, market-led responses— reducing the need for AEMO intervention where possible.**

An ST PASA can help identify near-term system shocks — for example, where flooding unexpectedly reduces gas production or transport capacity. From a practical perspective, we already provide daily D+0 to D+7 forecasts across markets (Part 27 of the National Gas Rules), and this existing reporting appears closely aligned with ST PASA- style reporting.

For MT PASA, we currently report capacity on a weekly basis for a 24-month forecast (Part 18 of the National Gas Rules). Revising this capacity forecast to 12 months for an MT PASA, can support improved accuracy and timeliness of data, particularly where long-range forecasting is less reliable. That said, **it is important that a new gas PASA**

framework complements and builds upon existing mechanisms rather than duplicating them. Our key concern is data duplication and the need to ensure that existing reporting is streamlined. This will help to minimise regulatory costs and improve reporting efficiency.

As acknowledged in the consultation paper and rule change request, AEMO already has access to detailed information under the GSOO, BB framework, the NGR (Parts 18,19, 20 and 27) and ECGS procedures. Where data gaps or quality issues exist — including within current BB reporting — we support targeted improvements focused on the timeliness, consistency, and accuracy of existing inputs. For example, more timely BB outage reporting would meaningfully enhance AEMO’s ability to assess supply adequacy. Our preference is for the AEMC to focus on strengthening the current reporting framework before introducing new obligations.

Where new reporting obligations are necessary to address clear data gaps, we strongly support:

- aligning new reporting obligations under Part 27 with Part 18 to reduce duplication and promote a single point of reporting (including for capacity outlooks and demand forecasts).
- streamlining reporting and removing duplicative requirements. We welcome the removal of ECGS daily demand forecast obligations under rules 687-688 if equivalent BB data is used. Similarly, any extended daily capacity outlook obligations should be integrated into Part 18.

Implementation and timing considerations

We support a phased implementation of the ST and MT PASA frameworks, including a trial period prior to full commencement. This will be important to test data processes, support participant readiness, and allow AEMO to refine procedures based on real-world experience.

To help support a smooth transition, it may be worthwhile for the AEMC and AEMO to:

- Provide early and clear guidance on data formatting and submission processes — particularly where reporting obligations under Parts 18 and 27 are expected to change or converge.
- Coordinate consultation on the development of ECGS procedures and any supporting IT system changes well in advance of go-live.

- Allow sufficient lead time for participants to update systems and processes, particularly if changes to reporting granularity, frequency, or structure are required.
- Coordinate consistency of implementation with the development of other gas-related reforms — such as the introduction of a gas reliability standard, VGCR, and changes to market price settings.

It will also be important that compliance and enforcement settings reflect the phased rollout of the framework. In particular, during the trial and early implementation phases, participants should be given reasonable time to establish new processes and improve data quality. AEMO and the AER should prioritise education, guidance, and early engagement before applying strict penalties.

We reserve further detailed comments on the proposed gas PASA Framework for future consultation.

If you have any questions in relation to this submission, please contact me (maria.ducusin@energyaustralia.com.au or 03 9060 0934).

Yours sincerely,

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