

8 May 2025

Australian Energy Market Commission (AEMC)

Submitted via www.aemc.gov.au

Dear AEMC

ECGS Projected Assessment of System Adequacy (PASA) (GRC0080)

Hydro Tasmania welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper on the proponents' rule change request which proposes that the Australian Energy Market Operator (AEMO) produce two new forecasts of reliability and supply adequacy (RSA) in the east coast gas system (ECGS).

We support the intent of the rule change to provide market participants with the information needed to improve decision-making and minimise volatility in the ECGS. We agree that the proposed short and medium-term PASAs, as well as the principles-based framework and specific outputs detailed in the consultation paper, represent a reasonable and appropriate step towards achieving this outcome.

The consultation paper notes that "some changes would need to be made to Part 18 of the National Gas Rules (NGR)" to support both the short and medium-term PASAs. Although the proposed changes to Part 18 would primarily be made to support supply and infrastructure capacity forecasts, Hydro Tasmania encourages the AEMC to consider the benefits and costs of imposing any additional reporting requirements upon Bulletin Board (BB) large user facilities, as currently defined under [Part 18 | Rule 141\(1\)](#) of the NGR. Specifically, we believe it would be appropriate to maintain the current exemptions for BB reporting entities under [Part 18 | Rule 164](#), [Rule 167](#), and [Rule 190](#) of the NGR. It is unlikely that an expansion of reporting obligations for BB large user facilities would benefit the accuracy of AEMO's modelling to a degree that would justify the additional administrative burden placed upon market participants.

Hydro Tasmania looks forward to ongoing engagement with the AEMC as the Stage 2 reform package continues to progress. If you wish to discuss any aspect of this submission, please contact Dylan Sahlin at dylan.sahlin@hydro.com.au

Yours sincerely

A handwritten signature in blue ink that reads "John Cooper".

John Cooper
Manager Market Regulation

