

28 August 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) draft determination regarding the proposed short-term and medium-term projected assessments of system adequacy (PASAs) for the east coast gas system (ECGS).

Hydro Tasmania agrees with commentary in the AEMC's draft determination that Bulletin Board (BB) large user facilities should be exempt from the new medium-term capacity outlook (MTCO) positive obligation. We believe the counterfactual would be unlikely to enhance modelling to a degree that would justify the increased burden on participants. Nevertheless, we support retaining the existing obligation on BB large user facilities to report on expected daily capacity reductions when affected by maintenance work over the MTCO period, and see this as an important input to the MT PASA.

Hydro Tasmania notes that the Australian Energy Market Operator's (AEMO) [High Level Implementation Assessment](#) (HLIA) was released on 21 August 2025. The HLIA requests that the AEMC introduce a new Draft Rule 410 clarifying that "the extension to 7-days for the Short-Term Trading Market (STTM) bids should only apply to the price taker bids and not to the ex-ante offers and bids." Having held similar concerns with the reporting granularity implied in the draft determination, we agree that collecting ex-ante offer and bid reporting over a 7-day timeline (theoretically a reflection of avoidable demand) would have limited value given the STTM's natural price volatility as a hub-based spot market. Accordingly, we support AEMO's proposed revision.

Hydro Tasmania acknowledges that the AEMC plan to consolidate several new and existing reporting obligations (namely Part 27) into Part 18 of the National Gas Rules (NGR) and welcome these efforts to promote simplicity and consistency across the NGR.

Hydro Tasmania looks forward to continued engagement with the AEMC on ongoing ECGS reliability and supply adequacy reforms, and with AEMO as they progress the implementation

of the final determination. 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 black ink, appearing to read 'Colin Wain', with a long horizontal stroke underneath.

Colin Wain
Manager Policy Development

