



22 January 2026

Reliability Panel
 Australian Energy Market Commission
 GPO Box 2603, Sydney NSW 2001

Re: CleanCo Submission on the Compliance Template Review 2026 Issues Paper

CleanCo Queensland welcomes the opportunity to provide a submission to the issues paper of the *Compliance Template Review 2026*.

CleanCo was established by the Queensland Government in 2018 to own and operate a portfolio of flexible, responsive generation assets and support the development of new clean energy projects. Our purpose is to deliver affordable, reliable, and sustainable energy solutions that meet the needs of Queensland households and businesses. With over 1.1 GW of dispatchable firming capacity and a growing portfolio of renewable generation, we are well placed to provide insights into how market frameworks can deliver investment certainty, system reliability and least-cost outcomes for consumers during the transition.

CleanCo's support for the Compliance Template Review

CleanCo supports and welcomes the Australian Energy Market Commission (AEMC) review of the Compliance Template for Compliance Programs and its proposed updates to the Compliance Template to reflect change made to the National Electricity Rules performance standards. It is encouraging to see the AEMC engage with industry to provide their feedback on the three key issues to develop well-informed and high-quality Compliance Template.

CleanCo recognises the importance of the three key issues on which the Panel is seeking feedback: updates to the template to reflect a broader set of plant types, new and amended technical requirements and changes in technology and costs. These updates will ensure the Compliance Templates are modernised as the energy industry evolves, plant facilities are compliant and running safely and reliably and the principles of good regulatory practice are upheld. This is particularly relevant given ongoing technology advancement and the increasingly diverse operational and commercial arrangements being adopted by energy companies.

CleanCo's submission for how the Compliance Template addresses Registered Participants who are not owner or operators of a facility

An emerging industry trend identified by CleanCo is the growing prevalence of commercial agreements where the Registered Participant is neither the owner nor the operator of the facility.

While the responsibilities of the owner/operator and Registered Participant are addressed through commercial agreements, from a compliance perspective it is unclear what the AEMC and AER's expectations of the Registered Participant's Compliance Program are in these circumstances. While

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CleanCo understands that there are clear obligations of a Registered Participant, irrespective of commercial agreements with another party under NER Clause 4.15 (b) and (c), there is an opportunity for these arrangements to be acknowledged as part of the review of the template for compliance programs. If this issue is not addressed, Registered Participants may continue to be exposed to greater risk of non-compliance. CleanCo believes that the AEMC could use the Compliance Template review process as an opportunity to provide greater clarity on this matter.

CleanCo suggests that the AEMC consider providing guidance around a model where the Registered Participant does not directly perform the activities required under the compliance template. Instead, the facility owner and/or operator would be responsible for undertaking the testing and providing the results to the Registered Participant. The Registered Participant would then remain accountable for auditing the outcomes and retaining records to provide to the AER in the event of an audit.

Under this model, the Registered Participant would continue to be accountable for the generator compliance program as per NER Clause 4.15 (b) and (c) and would ensure that owner/operator testing is aligned with the requirements of the compliance template. Owners and operators would perform the tests as they are best placed to do so, given their greater insight, access, and control over the facility and its control systems.

CleanCo believes addressing this lack of clarity will ensure Registered Participants understand the expectations of compliance, monitoring and record keeping when the Registered Participant does not directly operate the facility.

CleanCo looks forward to the outcomes of the review process and the updates proposed for the Compliance Template.

We would welcome the opportunity to discuss this submission in more detail. Please contact us via regulation@cleancoqld.com.au , if you would like to follow up on any aspects of our response.

Yours sincerely,

DocuSigned by:

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CleanCo