



Reliability Panel
Australian Energy Market Commission
60 Castlereagh Street
Sydney NSW 2000

22 January 2026

To Reliability Panel,

Compliance Template Review 2026 – issues paper

ENGIE Australia & New Zealand (ENGIE) appreciates the opportunity to respond to the Reliability Panel's (Panel) issues paper on the Compliance Template Review 2026.

The ENGIE Group is a global energy operator in the businesses of electricity, natural gas and energy services. In Australia, ENGIE operates an asset fleet which includes renewables, gas-powered generation, and battery energy storage systems. ENGIE also provides electricity and gas to retail customers across Victoria, South Australia, New South Wales, Queensland, and Western Australia.

ENGIE supports the Reliability Panel's timely and necessary review of the Template for Compliance Programs. Since the template last went into consultation in 2019, a significant number of rule changes have been implemented along with substantial changes to generation and storage technologies. The template remains an important tool in assisting ENGIE to meet its compliance obligations across its asset portfolio, and it is therefore essential that it continues to remain fit for purpose as the energy transition progresses.

ENGIE is therefore supportive of the approach adopted by the Panel in conducting this review and is broadly comfortable with the proposed updates to the guiding principles outlined in this issues paper.

As the Panel has outlined, the template should serve to assist registered participants and strike the right balance between prescription and flexibility. ENGIE considers that the current template has largely achieved this balance and would expect a degree of continuity to be maintained through the review process. Where substantive revisions are ultimately proposed, it will also be important that participants are afforded sufficient time and transitional flexibility to update and revise their compliance programs.

While ENGIE recognises the importance of robust testing, the current testing frequency might not be delivering commensurate compliance benefits to the costs incurred. Costs are driven by daily rates, mobilisation and reporting, with more frequent testing resulting in repeated mobilisation and reporting requirements. Additionally, there are operational and market-related costs as testing often requires units to

be operated at or near full load. While participants seek to schedule testing during periods that minimise exposure to adverse market conditions, contractor availability does not always align with favourable pricing outcomes. In addition, many tests are undertaken at the limits of unit capability, increasing the risk of unit trips and the need for repeat testing, further increasing operational and market costs. ENGIE notes that these costs associated with compliance program testing have increased in recent years.

In light of this, ENGIE considers that there may be scope for the template to allow greater flexibility in how testing regimes are applied, while still maintaining appropriate regulatory confidence. For example, Reactive Power Capability (S5.2.5.1) is required every 3 years, however, it might be beneficial to have this at a testing frequency of 4 years to be better aligned to other major compliance tests.

Concluding Remarks

ENGIE looks forward to continued engagement with the Panel in designing the Template for Compliance Programs to ensure it remains fit for purpose in helping Registered Participants meet performance standards and contribute to the delivery of a reliable and secure electricity supply for customers.

Should you have any queries in relation to this submission, please do not hesitate to contact us by telephone on 0436 929 403

Yours sincerely,



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