



Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

12 March 2026

To Ms Collyer,

Calculating the cumulative price – Draft determination

ENGIE Australia & New Zealand (ENGIE) appreciates the opportunity to respond to the Australian Energy Market Commission's (the Commission) draft determination on the rule change requests from Delta Electricity and Snowy Hydro to amend the National Electricity Rules (NER) in relation to the calculation of the cumulative price during periods of market stress.

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 is supportive of the Delta and Snowy Hydro rule change requests and considers the proposed calculation methodologies in these requests would help address identified issues in the cumulative price methodology. While market suspensions due to market stress have historically been very rare, improving the clarity of the application of the cumulative price calculation during periods of significant volatility would support investment signals.

In the remainder of this submission, ENGIE provides some additional feedback focused on the Commission's proposed implementation of the Snowy Hydro rule change request.

Differentiation of a 'technological failure' from situations with underlying market stress

ENGIE is broadly supportive of the Commission's proposal to differentiate between the underlying causes of market suspensions to better target the rule change to the specific scenarios the Snowy Hydro rule change request intends to address. However, there is a risk that this differentiation may introduce additional complexity and provide uncertainty for participants as to whether a market suspension will result in specific trading intervals being excluded from the calculation of the cumulative price.

The draft determination acknowledges there may be scenarios where market stress has coincided with a technological failure, such as a system black event. This is addressed by the draft rule amendment requiring the exclusion of relevant trading intervals from the cumulative price calculation if technological failures were not the 'sole reason' for the market suspension. Despite this drafting of the rule amendment, ENGIE expects the Australian Energy Market Operator (AEMO) may experience challenges in making an accurate assessment of the underlying reasons for the event in a timely manner during a significant and complicated event.

ENGIE appreciates that the Commission has drafted the term 'technological failure' in a broad manner to reflect the unpredictability of issues that may lead to market suspensions. However, ENGIE would prefer AEMO being provided additional guidance and clarity on how to interpret and apply the term. This would help ensure that AEMO applies the rule amendment in the manner intended by both the rule change proponent and the Commission.

Clarity on the calculation of the cumulative price when trading intervals are excluded

ENGIE echoes feedback in the Australian Energy Council's submission to this consultation that the draft rule amendment does not appear to provide certainty on the time period over which the cumulative price is calculated when a trading interval is excluded.¹

More specifically, in ENGIE's view the rule amendment is not clear whether the cumulative price calculation is required to include additional trading intervals to make-up for the excluded trading intervals (to ensure a total of 2,016 trading intervals included in the sum of spot prices). If this were not the case, there may be unintended consequences on the calculation of the cumulative price and the application of the administered price cap.

Concluding remarks

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

Yours sincerely,



Matthew Giampiccolo

Manager, Regulation and Policy

¹ Australian Energy Council 2026, Submission – Calculating the Cumulative Price – Draft determination, 12 March, p. 2.