

12 March 2026

Australian Energy Market Commission (AEMC)

Via AEMC website: [www.aemc.gov.au](http://www.aemc.gov.au)

## Calculating the cumulative price - Draft determination

Alinta Energy welcomes the opportunity to provide feedback to the AEMC on the *National Electricity Amendment (Calculating the cumulative price) Draft rule determination*.

We make the following recommendations for the Commission's consideration:

- **We support the Commission's more preferable draft rule in response to the rule change requests submitted by the proponents Delta Electricity (Delta) and Snowy Hydro (Snowy).** We consider the draft rule addresses the issues raised by the proponents and will provide enhanced certainty to market participants during dual-region APP events and in calculating the CPT during times of market suspension.
- **We consider the benefits will outweigh the costs to implement the rule change.** We note the Commission's focus on balancing implementation costs and benefits, with the magnitude of benefits "difficult to determine"<sup>1</sup>. We consider the benefits outweigh the costs, noting that:
  - The rarity of the 2022 market suspension period does not negate the need to have a solution in place should this happen again. While the 2022 market suspension was a rare event, such events are difficult to predict and may occur in future. Should such an event occur in future, Snowy has clearly established the need for a solution to ensure market participants receive the benefit of the CPT in such conditions, lessening risks for sellers of hedging products and retailers' insolvency risks<sup>2</sup>.
  - As identified by the AEMC, the draft rule would avoid the CPT being reached prematurely and would strengthen availability signals. Further, the likelihood of prices approaching the CPT may increase in future if higher demand and a rising proportion of renewable generation increases price exposure to dunkelflaute events.
  - Finally, the Commission has implied that a manual calculation methodology could be adopted by AEMO for both proposals, rather than amend AEMO systems<sup>3</sup>. We encourage the Commission to consider a simpler manual calculation alongside the option of changes to AEMO systems. We consider

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<sup>1</sup> 'Draft rule determination – National Electricity Amendment (Calculating the cumulative price) Rule', AEMC, 29 January 2026, p.1.

<sup>2</sup> 'Calculating the cumulative price Consultation Paper', Snowy Hydro, 20 November 2025, p.1.

<sup>3</sup> 'Draft rule determination – National Electricity Amendment (Calculating the cumulative price) Rule', AEMC, 29 January 2026, p.21.

the clearly articulated value of the rule change requests justifies a solution to be implemented, and the simpler manual approach would address cost concerns.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please contact Isidora Stefanovic at [isidora.stefanovic@alintaenergy.com.au](mailto:isidora.stefanovic@alintaenergy.com.au).

Yours sincerely,

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