



April 16, 2026

Submitted via online submission portal: aemc.gov.au/contact-us/lodge-submission

RE: ERC0430 - Small changes to Integrating Price-Responsive Resources rule

About Shell Energy in Australia

Shell Energy provides the energy businesses and households need for today and tomorrow.

A generation-backed trader and energy retailer, Shell Energy powers businesses and homes and acts as a catalyst to positively impact Australia's energy future.

We provide electricity, gas, and innovative solutions for our customers, complemented by our portfolio of gas fired peaking power stations and battery storage assets, which support energy security and reliability.

Shell Energy is Australia's largest electricity retailer to commercial and industrial businesses, recognised for our market-leading customer service.¹ We offer business electricity, gas, and smart energy solutions. Our residential business, Powershop, provides greater choice and confidence to households and small businesses to help them take control of their energy through multiple energy plan options and digital tools.

General Feedback

Shell Energy supports the 5 rules changes as proposed by AEMO. In particular, we support the proposed changes to the defined term *minimum ramp rate requirement* in Chapter 10 of the Rules which provide clarity on the application of the minimum ramp rate requirements to voluntary scheduled resources (VSRs).

However, we wish to highlight the interaction between the drafting of the Integrating Price-Responsive Resources reforms and the **Generator ramp rates and inflexibility rule changes**, that commenced in 2016. This earlier reform was intended to prevent large aggregated scheduled generating units from bidding a single minimum ramp rate, capped at 3 MW per minute or 3 per cent of capacity, which had the effect of allowing these assets to be represented in dispatch as substantially more inflexible than their true physical capability. This reform was implemented through clause 3.8.3A(b)(1)(iv), which requires the minimum ramp rate for an aggregated generating unit to reflect the sum of the minimum ramp rate requirements for each physical unit.

While these reforms are intended to accommodate voluntarily scheduled, the amendment to clause 3.8.3(b)(1)(iv), as currently drafted, appears to remove the existing requirement applying to aggregated units. This would have the effect of reverting aggregated scheduled generation to the pre-2016 treatment, weakening the existing generator ramp-rate framework and associated generator discipline.

Shell Energy urges the AEMC to consider addressing this unintended consequence of implementing the Integrating Price-Responsive Resources reforms. A potential solution the Commission may wish to consider is whether clause 3.8.3(b)(1)(iv) should be kept closer to its current form, while explicitly excluding voluntarily scheduled resources and potentially semi-scheduled aggregated resources that are comprised of smaller physical units. Complementing this would be an additional subclause 3.8.3(b)(1)(v) introducing a separate subclause to address minimum ramp rate requirements for voluntarily scheduled resources and eligible semi-scheduled aggregated resources below a defined physical unit capacity threshold, rather than implementing the pending change to subclause (iv) as currently drafted.

¹ Utility Market Intelligence (UMI) survey of large commercial and industrial electricity customers of major electricity retailers, including ERM Power (now known as Shell Energy) by independent research company NTF Group in 2011-2021.



Shell Energy welcomes further engagement on this topic. If you have any questions or would like further details relating to this submission, please contact Brett Crossley at brett.crossley@shellenergy.com.au.

Yours sincerely,

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