



14 May 2026

The Project Leader  
Compliance Template Review 2026  
REL0095  
Australian Energy Market Commission

Submitted online at: [Lodge a submission | AEMC](#)

Dear Project Leader

## **SUBMISSION: DRAFT REPORT OF THE 2026 COMPLIANCE TEMPLATE REVIEW**

CS Energy welcomes the opportunity to provide a submission in response to the draft report of the Reliability Panel's 2026 review of the template for compliance programs (**Draft Report**).

### **About CS Energy**

CS Energy is a Queensland-owned and based energy company that provides power to some of the State's biggest industries and employers. We generate and sell electricity in the wholesale and retail markets, and we employ almost 700 people who live and work in the regions where we operate.


CS Energy owns thermal power generation assets, and we are building a more diverse portfolio. We also have a renewable energy offtakes portfolio of almost 300 megawatts, which we supply to our large commercial and industrial customers in Queensland. CS Energy is developing a 400 MW gas-fired peaking generator at Brigalow near Kogan Creek in Queensland.


### **Key recommendations**


The current and draft compliance templates are appropriately established as guidance rather than as instruments requiring strict compliance by plant operators. We have one brief observation on the draft template.

Section 3.3 of the draft template sets out guidance on keeping records of the development of compliance programs and the results of periodic monitoring and testing of plant performance. It also would be helpful for the template to provide guidance about operational variations from an established compliance program. For example, there may be events that cause deferral of a test. The template could set out expectations in those circumstances about the keeping of relevant records and any advice to be provided to other parties such as the Australian Energy Market Operator or Transmission Network Service Provider.

Such guidance would improve clarity for Registered Participants and consistency of actions across the industry.

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If you would like to discuss this submission, please contact Don Woodrow, Market Policy Manager, on either 0407 296 047 or [dwoodrow@csenergy.com.au](mailto:dwoodrow@csenergy.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Demaria', written in a cursive style.

**Dr Alison Demaria**  
Head of Policy and Regulation