

Reliability Panel  
Australian Energy Market Commission  
Level 5, 201 Elizabeth Street  
Sydney NSW, 2000  
Australia

By online submission

28 September 2012

Dear Reliability Panel members,

**Re: REL0049 - Energy Adequacy Assessment Projection (EAAP) Review**

Thank you for the opportunity to comment on the Reliability Panel review of the operation of the EAAP.

When the EAAP was first established Australia was experiencing severe drought conditions which imposed energy limits on many generators. Hydro generators were impacted through reduced water storage levels, and many thermal generators were restricted due to scarcity of cooling water. We note that the EAAP is not restricted to energy limits due to water shortages, and could be useful in assessing other forms of energy limitation, such as fuel shortages.

With the drought conditions having now passed, the EAAP information is not as important to IPRA in day to day operations as it was previously. It would seem that the importance of the EAAP information is likely to vary over time, and is likely to be more critical at times of drought, or other energy limits such as fuel shortages.

IPRA's view is that having established the processes for the EAAP, we should continue performing the EAAP even though its importance is diminished at present.

The EAAP principles currently require that a revised EAAP be published every 3 months. This requires input data to be entered by participants, and for AEMO to carry out the assessment and publication process.

To ensure that AEMO and industry participants are not wastefully expending resources on less important processes, perhaps the EAAP principles should be changed to enable the publication of the EAAP to be varied in response to the need as assessed by AEMO. For example, given the reduced risk at present, it might be appropriate for the EAAP publication to be extended to every 12 months. If the publication frequency were to be relaxed, a further option could be provided to allow

industry participants to request AEMO to publish ad-hoc reports in response to unexpected events or disasters.

Please do not hesitate to contact me on 03 9617 8331 or by email if you wish to discuss this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Chris Deague". The signature is fluid and cursive, with a prominent initial "C".

Chris Deague

Senior Market Specialist

International Power GDF Suez Australia