

21 April 2016

Emily Brodie
Project Leader
Australian Energy Market Commission
Submitted via website
AEMC reference - ERC0200

Dear Emily,

Re: National Electricity Amendment (Energy Adequacy Assessment Projection timeframes) Rule 2016

Thank you for the opportunity to provide comment on the Australian Energy Market Commission's (AEMC's) consultation paper (consultation paper). We note the consultation paper has been prepared in response to a rule change request from the Australian Energy Market Operator (AEMO) in relation to reducing the mandated frequency of publication of the Energy Adequacy Assessment Projection (EAAP).

Stanwell continues to support AEMO's proposal to reduce the administrative burden on participants by reducing the frequency of reporting to annually, with scope to publish additional reports as required. Stanwell also supports the AEMC progressing this as a fast tracked, non-controversial rule change given AEMO's previous consultation.

In response to AEMO's issues paper, Stanwell noted that the proposed triggers for supplementary reports must not trigger more often than the existing quarterly reporting. We note that the alternative approach proposed by the AEMC appears to address this issue. Accordingly while we do not consider the approaches to be significantly different, we have a preference for the approach suggested by the AEMC.

Is annual EAAP reporting sufficient, with additional reporting when required, in providing information about energy constraints to NEM participants and other interested stakeholders?

Yes.

Should AEMO be required to publish an additional EAAP within a certain period of trigger events or when it becomes aware of new information that could materially change the EAAP, or should it have discretion to publish an additional EAAP when it becomes aware of new information that may materially alter the most recently published EAAP?

Stanwell supports AEMO having the discretion equivalent to that which they currently hold in relation to the publication of other reports such as MTPASA and the GSOO. We consider that the inclusion of defined time periods is unnecessary as it is unlikely to materially enhance AEMO's performance in this regard.

How should the obligation for scheduled generators to provide GELF parameters for additional EAAP reporting be activated?

Stanwell supports the provision of all GELF parameters (routine and additional) to continue in the current manner. That is, through a process of providing designated contacts to AEMO,

who are then able to request that the parameters be updated. This approach will minimise implementation costs in relation to the proposed Rule change.

Where should trigger events or factors to consider in relation to additional EAAP reporting be specified?

Stanwell supports these factors being specified broadly in the rules, as is the case with PASA. In relation to MTPASA clause 3.7.2(b) states

AEMO may publish additional updated versions of the *medium term PASA* in the event of *changes* which, in the judgment of *AEMO*, are materially significant.

Equivalent wording for the EAAP appears likely to be sufficient.

Thank you for your consideration of Stanwell's response to the consultation paper. If you would like to discuss any aspect of this submission, please contact me on 07 3228 4529.

Regards



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Energy Trading and Commercial Strategy