

23 September 2021

Ms Anna Collyer
Ms Merryn York
Mr Charles Popple
Ms Michelle Shepherd
Ms Allison Warburton

Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Lodged electronically: www.aemc.gov.au

Dear Commissioners

Updating Short-term PASA Rule (ERC0332) – Consultation paper – 26 August 2021

EnergyAustralia is one of Australia's largest energy companies with around 2.5 million electricity and gas accounts across eastern Australia. We also own, operate and contract a diversified energy generation portfolio across Australia, including coal, gas, battery storage, demand response, wind and solar assets, with control of over 4,500MW of generation capacity.

Overall we are supportive of the proposed rule amendments to move to a principles-based approach, combined with explicit objectives for the ST PASA. This would allow AEMO the flexibility to accommodate developments from its ST PASA replacement project and others arising as the system transforms towards a new technology mix.

Our primary feedback on the proposed amendments relates to publishing information at the individual unit level. The proposed rule would only see plant maximum output subject to a combination of fuel and technical availability published for semi-scheduled generating units. We recommend semi-scheduled unit information explicitly cover technical availability (i.e. not adjusted by fuel availability) in the same way as for scheduled generators.

A forward-looking measure of technical availability of wind and solar resources would capture any plant output limits imposed by outages on inverters, turbines, transformers etc. This would be combined with participants' own dynamic views on fuel availability and enable them to make better decisions on resource commitment. The AEMC should also consider having semi-scheduled technical availability data published as part of the MT PASA, as the same logic applies over these timeframes.

If you would like to discuss this submission, please contact James Ley on 03 9060 0751 or james.ley@energyaustralia.com.au.

Regards

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EnergyAustralia

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