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### **ERC0256 Generator Registrations and connections draft rule determination**

AGL Energy Limited (AGL), appreciates the opportunity to comment on the Australian Energy Market Commissions Generator Registrations and Connections draft rule determination. AGL believes that the AEMC may have made this draft determination without adequate cost benefit analysis into the effects that non-scheduled generators between 5MW and 30MW have on scheduling and forecasting.

The AEMC notes in their draft determination that there is insufficient evidence to suggest that these generators are contributing to inaccuracies in scheduling and forecasting but fail to present what they consider insufficient evidence. We note that while the AEMC undertook its review of generator thresholds in 2017, it is unclear as to whether any further detailed analysis has been conducted since that time. Without understanding the magnitude of the impact that non-scheduled generation has on market and power system outcomes, it is difficult to determine if the potential benefits in terms of improved price discovery, information provision and power system management would outweigh the costs associated with scheduling for smaller generators (e.g., compliance costs and the installation of new equipment). The AEMC should clearly identify the extent to which the different types of non-scheduled generation affect market and power system outcomes, and whether any identified issues are likely to worsen in the short-to-medium term. This analysis would then inform if and when a different scheduling threshold (higher than 5MW but lower than 30MW) may be required. It would be highly advantageous to undertake this analysis and form an opinion before the increased proliferation of smaller generating units and the exit of larger units causes the scheduling and forecasting inaccuracies to be substantial and problematic for the NEM.

If you would like any further information or have questions about this submission please contact Marika Suszko, Wholesale Regulation Manager at [msuszko@agl.com.au](mailto:msuszko@agl.com.au).

Yours sincerely,

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