INSERT NAME OF RULE CHANGE REQUEST

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

|  |  |
| --- | --- |
| **ORGANISATION:** |  |
| **CONTACT NAME:** |  |
| **EMAIL:** |  |
| **PHONE:** |  |
| **DATE** |  |

project DETAILS

|  |  |
| --- | --- |
| **NAME OF RULE CHANGE:** | **Updating Short Term PASA** |
| **PROJECT CODE:** | **ERC0332** |
| **PROPONENT:** | **Australian Energy Market Operator** |
| **SUBMISSION DUE DATE:** | **23/09/2021** |

**CHAPTER 4** – Assessment framework

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| 1. Do stakeholders agree with the proposed assessment framework? Are there additional principles that the Commission should take into account? |  |

**CHAPTER 5.1** – The current arrangements are not understandable, have unnecessary prescription and limit aemo’s flexibility to make changes

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| --- | --- |
| * 1. Do stakeholders agree that the current arrangements in the NER in relation to ST PASA are overly prescriptive? If so, which arrangements and why? |  |
| * 1. Do stakeholders agree with AEMO’s perspective that the current arrangements in the NER in relation to ST PASA lead to ambiguity? Are there any other negative effects due to the current arrangements? |  |
| * 1. Do stakeholders agree that there is likely to be an ongoing need for flexibility in relation to ST PASA and that moving requirements to AEMO procedures is preferable to keeping them in the NER? |  |

**CHAPTER 5.1.1** – The ner would provide an objective for st pasa

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| 3.1 Do stakeholders agree with AEMO’s proposed objective for ST PASA. If not, what elements should be added or removed from the objective? |  |
| 3.2 Do stakeholders have views on relevant guiding principles in relation to ST PASA? |  |

**CHAPTER 5.1.2** – the ner would require aemo to develop and publish procedures to describe inputs, outputs and a methodology

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| --- | --- |
| 4.1 Do stakeholders support the NER requiring AEMO to pubish the procedures as described? |  |
| 4.2 Should there be other requirements on AEMO in relation to publication of ST PASA information? |  |

**CHAPTER 5.1.3** – Specify that AEMO may undertake a single-stage consultation process for the st pasa procedures

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| 5.1 Considering that the proposed rule change would result in a rule that is significantly less prescriptive than the current arrangements, do stakeholders agree with AEMO’s proposal that the ST PASA procedures should be subject to a single-stage consultation process? |  |

**CHAPTER 5.1.4** – Require aemo to publish st pasa at least daily

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| 6.1 Do stakeholders agree with AEMO’s proposal that the NER should continue to require AEMO to publish ST PASA at least daily? |  |

**CHAPTER 5.1.5** – require aemo to prepare various st pasa inputs

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| --- | --- |
| 7.1 Do stakeholders agree with AEMO’s proposal to specify ST PASA inputs at a high level in the NER? |  |
| 7.2 Is there anything that AEMO’s proposed changes leave out that its part of the current ST PASA rules/requirements? |  |
| 7.3 Do stakeholders have views on any other information that should be included in the required inputs for ST PASA? |  |

**CHAPTER 5.1.6** – replace references to scheduled generator and market participant with the generic term, registered participant

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| 8.1 Do stakeholders agree with AEMO’s proposal to change references to Scheduled Generator and Market Participant to Registered Participant? |  |

**CHAPTER 5.1.7** – require AEMO to publish ST PASA information to reflect the objective, with some specific information

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| 9.1 Do stakeholders agree with AEMO’s proposal to specify information to be published in the ST PASA at a high level in the NER? |  |
| 9.2 Is there anything that AEMO’s proposed changes leave out that is part of the current ST PASA rules/requirements that should continue to be included? |  |
| 9.3 Do stakeholders have views on any other information that should be included in the required information to be published for ST PASA? |  |

**CHAPTER 5.1.8** – Definition changes

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| 10.1 Do stakeholders support the proposed changes to the definition of energy constraints? |  |
| 10.2 Do stakeholders support the proposed changes to the definition of PASA availability? |  |

**CHAPTER 5.1.9** – General comments

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| --- | --- |
| 11.1 Do stakeholders support AEMO’s proposal to introduce a principles-based approach to the NER in relation to ST PASA? |  |
| 11.2 Is an alternative solution, such as updating the prescriptions in the NER, a better approach? |  |

**CHAPTER 5.2** – Specification of st pasa being published over seven days

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| 12.1 Do stakeholders support the specification that ST PASA is published over seven days from real-time? |  |

**CHAPTER 5.3** – publication of generator availability on a duid level

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| 13.1 Do stakeholders consider that the current arrangements of publishing generator availability information aggregated at a region level in ST PASA is an issue? |  |
| 13.2 What are stakeholders’ views on AEMO’s proposed solution i.e. require the NER to specify that generator availability information be published at the DUID (unit) level? |  |
| 13.3 Is there an alternative solution? |  |
| 13.4 What are the particular commercial in confidence issues that would arise if generator availability information was published at the DUID level? Would the information be competitively sensitive? |  |