

Australian Energy Market Operator

Submitted via email: STPASARepacement@aemo.com.au

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Submission to AEMO Consultation on ST PASA Replacement Project Procedures

The Australian Energy Council welcomes the opportunity to make a submission to the AEMO Consultation on ST PASA Replacement Project Procedures.

The Australian Energy Council (AEC) is the peak industry body for electricity and downstream natural gas businesses operating in the competitive wholesale and retail energy markets. AEC members generate and sell energy to over 10 million homes and businesses and are major investors in renewable energy generation. The AEC supports reaching net-zero by 2050 as well as a 55 per cent emissions reduction target by 2035 and is committed to delivering the energy transition for the benefit of consumers.

Section 2.2 Participant Inputs – PASA Availability and Recall information

AEMO is proposing to only use this information internally to determine “options for directions to manage reserve conditions (i.e. projected failure to meet the reliability standard, assessed in accordance with the reliability standard implementation guidelines).” We think more value could be obtained from this information by using it to provide an additional useful data series to participants and AEMO of PASA reported availability over the STPASA timeframe. Hence there we be two data streams to inform participants and AEMO. Firstly, the current reliability assessment based on reported maximum availability and secondly the reliability assessment based on reported PASA availability and recall time.

Consultation process

The ST PASA Replacement represents a significant change from rules-based prescription to a principles-based approach giving AEMO more discretion. Accordingly, participants (and our members) have raised many issues during the process and AEMO’s response has been they will included in the second round of consultation. To ensure these issues are resolved in a more timely and consultative manner it would be helpful if could AEMO convene one (or two if necessary) technical working group meetings prior to release of the second consultation paper.

Any questions about our submission should be addressed to Peter Brook, by email to peter.brook@energycouncil.com.au or by telephone on (03) 9205 3103.

Yours sincerely,



Peter Brook

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Australian Energy Council