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Australian Energy Market Operator

By email: operations@aemo.com.au



Submission on the draft TSO CF

Dear AEMO team,

Haast supports AEMO and transmission network service providers using a common framework to identify capability gaps before they result in improvised operational responses. Our interest is practical. Limits advice, outage assessments, new security tools and other operational inputs can alter constraints and dispatch. An independent participant should be able to understand those outcomes without relying on asset ownership or bilateral access to AEMO or a network service provider. Two changes matter most to us: testing whether material constraint and dispatch decisions can be reconstructed from participant-facing information, and reporting whether voluntary adoption of the framework is actually occurring.

Include market-facing transparency in the maturity assessment

The spreadsheet already treats limits advice, operational planning risk assessment, performance reporting and external reporting as capabilities. For these areas, maturity should not stop at internal AEMO-TNSP coordination. It should also test whether a material operational decision can be reconstructed and explained afterwards.

Where an operational capability changes constraint formulation, applies a security tool or otherwise materially affects dispatch, the supporting record should identify the constraint or formulation affected, relevant system condition, principal assumptions, effective period and information expected to be published. AEMO does not need to disclose sensitive operational detail in real time. If information is withheld, aggregated or delayed, the reason and expected review or release point should be recorded.

Haast manages energy, FCAS and hedge risks using public AEMO information. Uneven access benefits participants with physical portfolios and close operational relationships, even where no preference is intended. The same publication criteria should apply regardless of participant size, portfolio or bilateral relationships.

Explain operational changes that affect dispatch

A change to limits advice, an outage rating or a security-tool assumption can alter a constraint and the resulting dispatch. Where that happens, participants should be able to identify after the event what changed, why it changed, the period for which it applied and whether normal publication was delayed or limited.

AEMO and the TNSPs must operate the system securely. The market price resulting from a necessary and proportionate action is not an operational capability objective, and the framework should not treat a lower price as evidence of a better operational response. Its focus should be whether the action was technically justified, consistently applied and explainable.

Make voluntary adoption visible

A voluntary framework will have limited value if no one can tell whether it is being used. Each capability should have an accountable AEMO-TNSP interface and practical implementation milestones.

AEMO's proposed annual description should identify each capability area assessed, its implementation status, any material remaining gap and the next step. It should also state whether participant-facing information was routinely withheld or delayed in that area. TNSP-specific detail can be aggregated where necessary. This would give the market useful visibility without prescribing how each TNSP must implement the framework.

Yours sincerely,

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