



EnergyAustralia

LIGHT THE WAY

29 June 2018

Congestion Information Resource Guideline Consultation
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Dear Mr Blake,

AEMO – Congestion Information Resource Guideline – First Stage Consultation

EnergyAustralia is one of Australia's largest energy companies with over 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market (NEM).

We welcome the opportunity to make a submission to the Australian Energy Market Operator's (AEMO) consultation on the Congestion Information Resource Guidelines.

Under the National Electricity Rules (NER) Transmissions Network Service Providers (TNSPs) are required to submit their current intentions and best estimates regarding planned network events¹. EnergyAustralia supports AEMO extending the requirement to all TNSPs to use the Network Outage Scheduler (NOS) when providing AEMO with this information. This will ensure that the most up to date information on TNSPs planned outages is available to participants through the NOS. Information on planned outages is critical to market participants allowing them to make informed decisions when committing plant (in the short term) and planning maintenance (in the short and longer term).

Section 3.2.2 of the Congestion Information Resource Guideline requires TNSPs to submit their current intentions on network outages that materially affect transfer capabilities for the next 13 months. TNSPs meet this obligation by entering this information into NOS for outages that have historically caused binding constraint equations. AEMO provides information on historical binding constraints to TNSPs (and other market participants) in both their Market Management System (MMS) and their annual NEM constraint report.

We are concerned that the requirement to only publish outages that have historically caused a binding constraint may omit outages that may bind in the future. Significant new generation capacity is forecast to be installed in the NEM over the coming years, industry has committed to over 1GW of new solar and wind projects with over 20GW proposed². This installation of new capacity (and retirement of older capacity) will

¹ NER clause 3.7A(p)(1)

² AEMO Rule Change Proposal – Generator Technical Requirements - <https://www.aemc.gov.au/sites/default/files/content/1e3e9d43-a82d-4d12-ac84-45e30d6eea72/Rule-change-request.pdf>

undoubtedly change how the power system operates and may cause outages that have not previously impacted the power system to bind in the future. TNSPs should be required to submit all outages to NOS allowing AEMO to assess the impact and invoke constraint sets accordingly.

In summary we are supportive of changes improving AEMO's and market participants' ability to obtain up to date information on planned network outages using the NOS provided that this information is on all outages and not limited to only historical outages that have caused binding constraint equations.

If you would like to discuss this submission please contact me on 03 8628 1630 or Andrew.Godfrey@energyaustralia.com.au.

Regards

Andrew Godfrey
Industry Regulation Lead