

1 April 2020



Audrey Zibelman
Chief Executive Officer and Managing Director
Australian Energy Market Organisation
GPO Box 2008
Melbourne VIC 3001

Dear Ms Zibelman

Generation Information Guidelines – Consultation Paper

Energy Queensland Limited (Energy Queensland) welcomes the opportunity to provide comment to the Australian Energy Market Operator (AEMO) on its Generation Information Guidelines - Consultation Paper (Consultation Paper). Energy Queensland has addressed the questions raised in the Consultation Paper in the attached submission.

This submission is provided by Energy Queensland, on behalf of its related entities Energex Limited (Energex), Ergon Energy Corporation Limited (Ergon Energy) and Ergon Energy Queensland Limited (Ergon Energy Retail).

Should AEMO require additional information or wish to discuss any aspect of Energy Queensland's submission, please contact me on (07) 3664 4105.

Yours sincerely

A handwritten signature in black ink that reads "C. G. Martin".

Charmain Martin
Acting Manager Policy and Regulatory Reform

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Encl: Energy Queensland submission on the Consultation Paper

AEMO Generation Information Guidelines

	Energy Queensland Response
<p>Question 1 Considering the intended purpose of the Generation Information Page, are the inclusions and exclusions of the various contents, data sources and guidance appropriate and well explained?</p>	<p>Energy Queensland considers the presentation of the Generation Information page to be appropriate.</p>
<p>Question 2 Given the purpose of the Generation Information Page as an information resource as outlined in Section 2.1, is the approach for reporting the current levels of existing and new developments of NEM generation capacity within the “Summary Status” categories appropriate?</p>	<p>Energy Queensland considers the approach for reporting in the summary status categories to be appropriate.</p>
<p>Question 3 AEMO could ask for a 10-year seasonal scheduled capacity forecast for all new developments.</p> <ul style="list-style-type: none"> • What are the pros and cons for such as request? • In particular, is it feasible for participants to estimate this with a reasonable level of confidence? • How might AEMO validate the information provided? 	<p>Generation, such as solar and wind, will be reliant on calculations based on assumed weather conditions (assuming the ability to generate without constraint) and scheduled generation will be able to be presented based on expected dispatch patterns. In both cases, similar calculations could be made using comparable assumptions by any interested party.</p> <p>Energy Queensland also considers that the listings for Scheduled Capacities based on summer and winter designations are insufficient for informing forecasting, particularly for thermal plant which is de-rated based on ambient temperature conditions throughout the year. We consider that more granular information would be useful.</p> <p>We note that Participants already embed similar seasonal capacity information in the Medium-Term Projected Assessment of System Adequacy (MT PASA) for 10 per cent probability of exceedance (POE10). However, this capacity information is not the same in the Generation Information page. For example, Darling Downs Power Station lists its winter scheduled capacity as 630 MW. From October, capacity reduces to 610 MW and between November and the end of April, capacity reduces again to 580 MW. Between April and May, capacity increases to 610 MW and from May capacity returns to 630 MW. However, the nameplate capacity is listed as 644.5 MW (364.5 MW</p>

	Energy Queensland Response
	<p>plus 280 MW). This makes forecasting its planned outage pattern in aggregated MT PASA a difficult exercise. As such, Energy Queensland suggests that where generation de-ratings occur, de-rated MW values and the dates they occur should be provided.</p> <p>We do not expect that provision of this information would create significant additional burden. However, rather than providing this information in the “Scheduled Capacities” tab, we suggest this information could be provided in the “<i>Existing Generation & New Devs</i>” sheet as a new column next to “Nameplate Capacity”.</p> <p>Also, we note that the timing of maximum generator capacity is not aligned with timing of market peak demand which occurs in the early to mid-evening. Available capacity at this time would also be useful.</p>
<p>Question 4 Is the application of the commitment criteria used to determine whether a generation project is categorised within either the NEM Generation Summary Status of “Proposed” or “Committed” appropriate? And if not:</p> <ul style="list-style-type: none"> • What alternative approaches could be considered? • What data should be used for such assessments and where should it be sourced? 	<p>Energy Queensland considers the presentation of the status commitment criteria to be largely appropriate.</p> <p>However, as a potential alternative indication of commitment, notification of execution of a connection agreement received by AEMO under clause 5.3.7(g) of the National Electricity Rules could be used. The generator must also have agreement of any negotiated access standard under clause 5.3.4A and any system strength remediation scheme under clause 5.3.4B to receive an offer.</p>
<p>Question 5 What additional Generation Information from data collected through the Generator Survey process should AEMO consider reporting on? Should AEMO seek additional data from participants for reporting purposes only?</p>	<p>Energy Queensland believes that the Generation Information page should also include stable minimum generation capacity. This information will be particularly relevant for existing coal-fired thermal generators which decide to reduce output in the middle of the day due to high levels of solar PV generation. Communication of this information is becoming increasingly important as more renewable energy generators are brought online.</p> <p>This information will also be important to avoid triggering the Retailer Reliability Obligation, in case thermal units need to be mothballed due to high levels of solar PV generation.</p> <p>Energy Queensland also considers that publication of Available Fault Level at transmission nodes or substations may be useful information for potential developers.</p>