



420 Flinders Street, Townsville QLD 4810  
PO Box 1090, Townsville QLD 4810

[ergon.com.au](http://ergon.com.au)

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

Submitted via email: [oliver.derum@aemo.com.au](mailto:oliver.derum@aemo.com.au)

Dear Ms Zibelman,

### **Australian Energy Market Operator: *Draft Generation Information Guidelines***

Ergon Energy Queensland Pty Ltd (Ergon Energy Retail) welcomes the opportunity to provide a submission to the Australian Energy Market Operator (AEMO) in response to the Draft Generation Information Guidelines (Guidelines).

AEMO's Discussion Paper in respect to Reporting 10-year seasonal capacity for all new developments provides "AEMO considers that the recently-adopted approach of requesting a "regular summer capacity" and a "10% probability of exceedance (POE) summer capacity" strikes an appropriate balance between complexity and accuracy".<sup>1</sup>

To inform our forecasting, Ergon Energy Retail seeks confirmation whether the capacity levels listed in the 'Scheduled Capacities' tab in the National Electricity Market (NEM) Generation Information file published on AEMO's website<sup>2</sup> aligns with the 10% POE Demand events. This is important as this information must coincide with winter and summer Medium Term Projected Assessment of System Adequacy (MTPASA) and with available capacity for the Retail Reliability Obligation (RRO).

We note that the values listed in the 'Scheduled Capacities' tab in the NEM Generation Information file lists the summer and winter ratings for each generator. Ergon Energy Retail understands that the upper and lower limits listed in this table refer to times where maximum and minimum temperature impact unit capacity. However, we also note that these ratings do not necessarily coincide with the capacity at 10% POE which occurs in the early evening rather than the hottest time of the day (usually during daylight hours).

With respect to seasonal de-ratings, the MTPASA states capacity (in MW) at the 10% POE event. If the capacities listed in the 'Scheduled Capacity' tab in the NEM Generation Information file reflect the capacity available at the 10% POE event, then we expect each

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<sup>1</sup> AEMO, *Draft Generation Information Guidelines Discussion Paper*, 5 May 2020, p.12.

<sup>2</sup> [https://aemo.com.au/-/media/files/electricity/nem/planning\\_and\\_forecasting/generation\\_information/nem-generation-information-april-2020.xlsx?la=en](https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/generation_information/nem-generation-information-april-2020.xlsx?la=en)

station's unit capacity value to be reflected in the MTPASA. However, where the capacity values stated in the 'Scheduled Capacity' tab in the NEM Generation Information file do not reflect the capacities of generators at the 10% POE event, then Ergon Energy Retail suggests that additional information is required to be provided in *Table 4 - Format of key connection information and supporting information*, by transmission network service providers to include the seasonal capacity of generators at 10% POE. As noted above, this should align with the MTPASA and also comply with the RRO.

Ergon Energy Retail therefore seeks clarification that AEMO will require a 10% POE as the winter and de-rated summer capacity for a generator. If faced with a choice between values for a regular summer capacity or a summer capacity based on 10% POE, Ergon Energy Retail's preference is for the 10% POE summer and winter capacity.

Otherwise, Ergon Energy Retail considers the Draft Generation Information Guidelines to be appropriate.

Should you require additional information or wish to discuss any aspect of this submission, please call Laura Males on 0429 954 346 or myself on 0467 782 350.

Yours sincerely



Trudy Fraser  
**Manager Regulation**

Telephone: 0467 782 350

Email: [trudy.fraser@energyq.com.au](mailto:trudy.fraser@energyq.com.au)