

25 June 2024

Mr Chris Muffett
NEM Reform Program
Australian Energy Market Operator

Submitted electronically



EnergyAustralia
LIGHT THE WAY

EnergyAustralia Pty Ltd
ABN 99 086 014 968

Level 19
Two Melbourne Quarter
697 Collins Street
Docklands Victoria 3008

Phone +61 3 8628 1000
Facsimile +61 3 8628 1050

enq@energyaustralia.com.au
energyaustralia.com.au

Proposed Amendments to System Operating Procedure 3707 – Issuing of Directions and Clause NER 4.8.9 Instructions

EnergyAustralia (EA) is one of Australia's largest energy companies with around 2.4 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. EA owns, contracts, and operates a diversified energy generation portfolio that includes coal, gas, battery storage, demand response, solar, and wind assets. Combined, these assets comprise more than 5,000MW of generation capacity.

EA appreciates the opportunity to comment on AEMO's expedited consultation, proposing amendments to System Operating Procedure 3707. EnergyAustralia is supportive of the proposed updates to market notices. However, in addition to the proposed changes, we would also like to see AEMO including the following valuable information in its notices to market:

1. The timing of the direction – this should capture the start and end times, including the region it was triggered. We assume AEMO will still invoke the direction constraints, but it would be good to have this confirmed in the market notice too.
2. Confirmation on whether (or not) the direction attracts intervention pricing, as has been done previously by AEMO in some cases. This should form part of BAU market notice process. As an example, a screengrab from a past email issued by AEMO is include below for reference.
3. Confirmation on the 'Service or Need' required for the direction AND that it is being (or has been) addressed by the direction.

- Further details on the issuance of the market notice captured in the 'Circumstance' section, linked to the type of service provided – this would capture, for example, a description of why AEMO determine the type of direction and service was appropriate.

EFFECTIVEDATE: 15/11/2023 10:00:23 PM
EXTERNALREFERENCE: Direction - NSW region 15/11/2023
NOTICEID: 111375
NOTICETYPE: MARKET
REASON: AEMO ELECTRICITY MARKET NOTICE.

Direction - NSW region 15/11/2023

In accordance with section 116 of the National Electricity Law, AEMO has issued a direction to a participant in the NSW region. For the purposes of the National Electricity Rules this is a direction under clause 4.8.9(a).

The direction was necessary to maintain the power system in a secure operating state.

AEMO may issue or revoke additional directions in order to meet the current requirement, unless sufficient market response is provided. A further market notice will be issued when all directions related to this requirement have been cancelled.

The issue of the direction commences an AEMO intervention event. AEMO declares all trading intervals during the event to be intervention trading intervals, commencing from the interval ending 2205 hrs on 15/11/2023.

Intervention pricing does not apply to this AEMO intervention event.

Manager NEM Real Time Operations
TYPEID: MARKET INTERVENTION

Should you wish to discuss our submission further, please contact me at Dan.Mascarenhas@energyaustralia.com.au or on 0422 399 181.

Kind Regards

Dan Mascarenhas
Regulatory Affairs Lead