

12 October 2026

Market Reform
Australian Energy Market Operator
By email: marketreform@aemo.com.au



Market Visibility Framework for price responsive resources

Dear Market Reform team,

Haast Energy Trading supports AEMO's proposal to develop a separate price responsive pre-dispatch sensitivity and publish it following validation. In response to Question 6, we endorse the proposed market-wide use of this information and offer two refinements on access and timing. [1, pp7, 35-36]

The information would be valuable to independent financial participants such as Haast. A credible response scenario alongside the base forecast would help us assess scarcity, value hedges and manage electricity risk. We welcome the paper's recognition that better visibility can support more efficient pricing in financial markets. [1, p18]

As the detailed design is developed, please confirm that physical and financial participants will receive the published aggregate information simultaneously and on equal terms, regardless of asset ownership or participation in trials. Standard machine-readable publication, with the corresponding base forecast, issue time, assumptions and uncertainty identified, would make the results practical to use. Issued versions and corrections should remain available for performance assessment.

An initial internal trial is sensible given the need to test accuracy and how publication may affect the behaviour being forecast. We support the planned Phase 2 publication and encourage AEMO to release useful validated results as soon as practicable. If existing data or voluntary trials support earlier publication, that need not wait for mandatory reporting obligations to begin. Clear publication criteria and an indicative timetable would help participants prepare.

Aggregate publication can protect confidential customer and portfolio information while giving the broader market a more informed view of potential price response. We support this direction and encourage AEMO to make participant access a priority as the framework develops.

Yours sincerely,

Phillip Anderson
Haast Energy Trading

Reference

[1] AEMO, A market visibility framework for price responsive resources: consultation paper on draft policy framework, September 2026.