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Australian Energy Market Commission
201 Elizabeth Street
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ERC0232

National Electricity Amendment (Reporting of aggregate generation capacity for MT PASA Rule 2018)

Alinta Energy (**Alinta**) welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (**AEMC**) *National Electricity Amendment (reporting of aggregate generation capacity for MT PASA Rule 2018 (the consultation paper))*.

Alinta is an active investor in energy markets across Australia with an owned and contracted generation portfolio of nearly 3,000MW, including 1,700MW of gas-fired generation facilities and 1,070MW of thermal generation facilities, and in excess of 940,000 electricity and gas customers including more than 440,000 in east coast markets. Alinta is committed to renewable energy development and is actively growing its renewables position with a public commitment to reach 1000MW of renewable capacity by 2020

The diversity of Alinta's portfolio, its investment strategy, product offerings, and first-hand experiences has allowed it to develop a detailed understanding of the existing Medium Term Projected Assessment of System Adequacy (**MT PASA**) obligations and processes. Alinta is therefore well placed to provide informed comment to the consultation paper.

Support for Rule change

Alinta supports the Australian Energy Market Operator's (**AEMO**) rule change proposal to remove the requirement to include the impact of network constraints in the methodology used in calculating the aggregation generation capacity for MT PASA. Alinta also notes that network constraints will continue to be taken into account in other relevant outputs of the MT PASA.

Request for “more preferable rule change”

In addition to supporting the rule change, Alinta is aware that several market participants as well as NEM observers are developing a view that the existing MT PASA processes may further benefit from an additional change to publish data on an individual generating unit basis. Alinta agrees with this view, and would encourage the AEMC to make a “more preferable rule change” to this affect.

In Alinta’s view the more preferable rule change would deliver the following benefits to market participants:

- Reduce the degree of information asymmetry currently contained within the existing MT PASA process for both market participants and market observers.
- Prevent the time-consuming process of market participants developing their own outage forecast calculating tools (which may not always be accurate).
- Allow for more efficient contracting, as market participants would know which individual parties may be seeking contractual products to cover their future outages. This increased transparency and signalling may allow for a more efficient outage-cover contracting process overall.

Conclusion

Alinta looks forward to participating in the AEMC’s ongoing consultation process and would encourage the further consideration of the more preferable rule change request.

Please contact Mr Anders Sangkuhl via email: anders.sangkuhl@alintaenergy.com.au or by phone 02 9375 0992 if you have any queries in relation to this submission.

Yours sincerely



Jacinda Papps
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