



InterGen (Australia) Pty Ltd  
Level 26, 400 George Street  
BRISBANE QLD 4000  
Australia  
ABN: 71 080 050 737  
Tel: + 61-7 3001 7177  
Fax: + 61-7 3001 7178

8 May 2018

Mr John Pierce  
Chairman  
Australian Energy Markets Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Mr Pierce

**RE: ERC0232 Reporting of aggregate generation capacity for MT PASA Consultation Paper**

InterGen Australia (**InterGen**) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper for AEMO's rule change request - Reporting of aggregate generation capacity for the medium term projected assessment of system adequacy (MT PASA).

By way of background InterGen Australia (**InterGen**) is owned by InterGen N.V. and the China Hua Neng Group (**CHG**). InterGen and CHG are leading developers and operators of electricity generation facilities worldwide. In Australia, InterGen is the operator and majority owner of the 851MW Millmerran Power Station and a 50% owner of the 810MW Callide C Power Station, both located in Queensland.

**General Comments**

InterGen supports AEMO's rule change request to remove the requirement to include the impact of network constraints in the reporting of aggregate generation capacity for MT PASA.

InterGen also supports ERM Power's submission to this consultation paper specifically that "in addition to publishing aggregate, energy constrained and energy unconstrained generation on a regional basis, it would be beneficial for the AEMC to make a more preferable rule change to enable AEMO to publish data on an individual generating unit basis"<sup>1</sup>.

InterGen supports ERM Power's reasoning for making the preferable rule change and concurs that it will significantly reduce the degree of information asymmetry currently within the MT PASA process whilst providing efficiency benefits to the market.

---

<sup>1</sup> ERM Power submission to AEMC consultation paper ERC0232 dated 3 May 2018

Please feel free to contact Mr. Robert Pane on 07 3001 7124 regarding any queries on this submission.

Kind regards

A handwritten signature in blue ink, appearing to read 'S. Bristow', is positioned above the typed name.

**Sam Bristow**  
**General Manager, Trading & Development**  
**InterGen (Australia) Pty Ltd**