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15 August 2019

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

Dear Mr Pierce

RE: ERC0270 Improving transparency and extending duration of MT PASA Rule Change Request

InterGen Australia (**InterGen**) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper on ERM's rule change request - Improving transparency and extending duration of 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 ERM Power's Rule change request¹ specifically changes:

- aimed at improving transparency and accuracy of generation availability data through the provision of individual generator availability data, the inclusion of committed generation in the MT PASA process and additional information on unplanned generator outages
- aimed at improving transparency and accuracy of demand forecasts through requiring AEMO to publish an additional demand forecast, increasing the frequency of demand forecast updates and simplifying the format of published demand
- to extend the outlook of MT PASA from two to three years

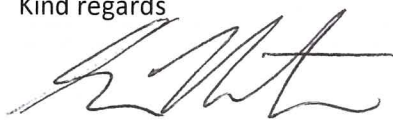
InterGen believes these changes will further increase the transparency in the market as well as being beneficial in facilitating functioning of the Retail Reliability Obligation as the 12-month extension will promote liquidity in the third year of trading in the financial contracts markets.

InterGen supports the Rule change being implemented as soon as practical.

¹ ERM Power Rule Change Requests to the AEMC dated 29 March 2019

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

Kind regards

A handwritten signature in black ink, appearing to read 'S. Bristow', with a stylized flourish at the end.

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