



Your Ref: ERC0305

13 May 2021

James Tyrrell  
Australian Energy Market Commission  
Sydney South NSW 1235  
**Submitted online to:** <https://www.aemc.gov.au>

Dear James

### **Submission: Prioritising arrangements for system security during market suspension**

CS Energy welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (**Commission**) Draft Rule Determination for the *National Electricity Amendment (Prioritising arrangements for system security during market suspension) Rule 2021*.

#### **About CS Energy**

CS Energy is a Queensland energy company that generates and sells electricity in the National Electricity Market (**NEM**). CS Energy owns and operates the Kogan Creek and Callide coal-fired power stations. CS Energy sells electricity into the NEM from these power stations, as well as electricity generated by other power stations that CS Energy holds the trading rights to.

CS Energy also operates a retail business, offering retail contracts to large commercial and industrial users in Queensland, and is part of the South-East Queensland retail market through our joint venture with Alinta Energy.

CS Energy is 100 percent owned by the Queensland government.

#### **General comments**

CS Energy supports the Commission's draft determination confirming that the National Electricity Rules (**Rules**) applies during periods of market suspension and accepts the Commission's rationale that it is not necessary to explicitly state this in the Rules.

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Furthermore, CS Energy welcomes the reaffirmation provided by the Commission that in extraordinary circumstances, where either AEMO or a market participant is unable to comply with an obligation critical to market operations or system security and other obligations under the Rules, the more critical obligation is prioritised.<sup>1</sup>

The Commission's draft determination provides market participants with the knowledge and confidence of the Rules applicability during periods of market suspension enabling participants to manage their risk under these conditions.

The draft determination also highlights the value provided by the functions of an administrative nature such as market notices enabling participants to make informed and efficient operational decisions, and an opportunity to address AEMO's concerns, including system security, with a market based solution.

If you would like to discuss this submission, please contact Henry Gorniak (Market and Power System Specialist) on [hgorniak@csenergy.com.au](mailto:hgorniak@csenergy.com.au) or M 0418 380 432.

Yours sincerely



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<sup>1</sup> AEMC, *Draft Rule Determination, Prioritising system security during market suspension*, p19