

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our membership covers a broad cross section of the Australian economy including significant retail, manufacturing, building materials and food processing industries. Combined our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

This short submission supports the Draft Determination. The EUAA strongly supports the Reliability Panel continuing its current role regarding setting both the reliability standard and reliability settings for the existing energy only market.

However, the lack of clarity in the Draft Determination prevents us from fully responding. We need greater clarity on the Panel's role in setting the reliability standard and settings if a capacity market is introduced.

- Will the reliability standard resulting from the Panel's current process be kept as the reliability standard to apply until 30 June 2028, irrespective of whether an energy only or capacity market is in place?
- What role will the Panel play in determining the settings that will apply under a capacity market?
  - From the start of the capacity market until 30 June 2028
  - Beyond 30 June 2028

The reason we are asking for this clarification is that we are concerned that the role of the Panel may be diminished if a capacity market is introduced. We have confidence in the Panel being the best party to meet the Commission's assessment framework of transparency and flexibility, minimising uncertainty and market changes and reducing regulatory and administrative burden.

We support the Panel continuing its current roles for an energy only market to a capacity market. This can easily be accommodated. The Draft's exclusion of 2024-25 means there should be no timing barrier to the Panel also advising not only on setting in an energy only market from 1 July 2025, but also settings in a capacity market from 1 July 2025. Given the ESB's, the latter can be easily achieved by giving the Panel a 12 month extension to consider the outcome of the ESB's capacity market work. We see this approach as very consistent with the assessment framework.

Do not hesitate to be in contact should you have any questions.

Kind regards,



Andrew Richards  
Chief Executive Officer