



3 March 2022

Anna Collyer
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms Collyer,

ENHANCING INFORMATION ON GENERATOR AVAILABILITY IN MT PASA – CONSULTATION PAPER

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback to the AEMC on the consultation paper for the *Enhancing information on generator availability in MT PASA* rule change from AEMO.

Broadly, Origin supports AEMO's proposal to collect and publish more detailed information about scheduled generator availability in MT PASA. Specifically, requiring generators to report a reason and estimated recall time when submitting MT PASA inputs – and AEMO publishing this information – could address any potential concerns over the status and recallability of plant.

Origin asserts the new unit status reporting requirements should be limited to a one-year outlook. This would help reduce the administrative burden of the new requirements on market participants while also provide the required level of supply-side visibility. Participants would not be able to confidently schedule the mothballing or temporary commercial withdrawal of units more than one year ahead, given uncertainty around changing market dynamics

The proposed changes would be more efficient than requiring market participants to complete multiple versions of MT PASA with availabilities defined over different return to service durations. This is because it would avoid duplication of processes and provide a clearer view of the generator recall times.

Consistent with AEMO's proposal, Origin supports AEMO developing standardised reason codes and embedding them in its guidelines (rather than the Rules). This will offer AEMO appropriate flexibility as it defines and implements the new reason codes, which should be subject to consultation with stakeholders.

Should you have any questions or wish to discuss this submission further, please contact Thomas Lozanov at thomas.lozanov@originenergy.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy