



AGL Energy Limited
ABN: 74 115 061 375
Level 24, 200 George St
Sydney NSW 2000
Locked Bag 1837
St Leonards NSW 2065
t: 02 9921 2999
f: 02 9921 2552
agl.com.au

Enhancing information on generator availability in MT PASA rule change – ERC0338

Submission via AEMC website

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AGL Response to AEMC Enhancing information on generator availability in MT PASA rule change draft determination

AGL Energy (**AGL**) welcomes the opportunity to comment on the AEMC Enhancing information on generator availability in MT PASA rule change draft determination (**draft determination**).

AGL is one of Australia's largest integrated energy companies and the largest ASX listed owner, operator, and developer of renewable generation. AGL is also a significant retailer of energy and telecommunications, providing solutions to around 4.2 million across Australia.

The draft rule determination aims to improve information about generator availability. The draft rule proposes to require generators to submit reason codes and recall times for unit availability. The reason and recall time information would be defined by AEMO in its Reliability standard implementation guideline (RSIG).

We support the AEMC draft determination. As stated in our earlier submission, we broadly support improvements to generator transparency, particularly when this information can facilitate efficient market outcomes. Our previous submission raised several issues. The AEMC's draft determination has provided clarity on these points. We consider the additional commentary provides the necessary certainty of how the key obligations should be shaped under the AEMO guideline.

We remain concerned that given the multiple factors that determine generator availability and recall times, any reporting framework will likely compromise the accuracy of the information provided in the interests of a broadly consistent and clear reporting framework. We note AEMO will develop the process, and the form, of the reason and recall time information. The decision on this trade-off will largely therefore fall to AEMO.

We note under cl 3.7.2(d1) of the draft rule, the unit state must distinguish between a physical and economic reason in accordance with the RSIG. This requirement may pose difficulties in circumstances where the reason is both due to physical, such as a forced outage, and subsequently an economic decision is made to extend the unavailability of the unit beyond the expected rectification works timeline. The AEMC should consider whether this draft rule requirement should be amended to allow for a status to include a combination of the two reasons. Alternatively, if the rule remains appropriate, the AEMC should clarify how a generator should report in these circumstances.

If you have any queries about this submission, please contact Kyle Auret on (03) 8633 6854 or KAuret@agl.com.au.

Yours sincerely,

Chris Streets

Senior Manager Wholesale Markets Regulation