



21 September 2021

Anna Collyer  
Chair  
Australian Energy Market Commission

Dear Anna

**Re: Updating Short Term PASA - ERC0332**

CitiPower, Powercor and United Energy welcome the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper on updating the short term projected assessment of system adequacy (ST PASA).

We support changes to the framework to provide the Australian Energy Market Operator (AEMO) and market participants flexibility to update ST PASA overtime to ensure it is up to date with rapid technological changes. As highlighted by Energy Security Board's (ESB) final recommendations on the post-2025 National Electricity Market (NEM) design in July 2021, including Scheduled Lite design, having visibility and forecasting accuracy of all parts of the network will play an important role in the future energy market.

We own and operate grid-scale distributed energy resources (DER) such as pole-top batteries and community batteries, with more than 40 additional batteries expected to come online by April 2023. As part of this role, we plan to work closely with AEMO to share forecast data where valuable for their ST PASA processes. We already provide forecast data to AEMO on their long term and medium term PASA.

As we transition to the distribution system operator (DSO) role as part of post-2025 NEM design, we will continue to work with AEMO to improve visibility and forecasting of dynamic DER activity on our networks and within our control.

Our feedback on the issues raised in the consultation paper is as follows:

- we support the flexibility of updating the framework through AEMO's procedures; however, to ensure AEMO's consultation with the industry is adequate, we propose the National Electricity Rules (rules) include minimum engagement requirements on AEMO as part of this process
- we support greater transparency of AEMO's methodology and forecasting approach, and encourage AEMO to work with market participations and networks to improve forecasting accuracy through shared learnings
- we support inclusion of networks in ST PASA through proposed changes to consider all Registered Participants in AEMO's procedures.

Please contact Sonja Lekovic on 0418 166 169 or [slekovic@powercor.com.au](mailto:slekovic@powercor.com.au) with any queries about this letter.

Yours sincerely,

Brent Cleeve  
**Head of Regulatory Policy and Compliance**  
**CitiPower, Powercor and United Energy**