



Part of Energy Queensland

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22 October 2020

Ms Merryn York  
Acting Chair  
Australian Energy Market Commission  
GPO Box 2603  
Sydney NSW 2001

Dear Ms York

### **ERC0279 – Transparency of Unserved Energy Calculation**

Ergon Energy Queensland Pty Ltd (Ergon Energy Retail) welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) in response to the *Transparency of Unserved Energy Calculation Consultation Paper* (Consultation Paper).

Ergon Energy Retail is generally supportive of the positions proposed in the Consultation Paper and that the proposed solution will provide adequate transparency for the calculation of unserved energy. In Ergon Energy Retail's view, outlining the calculation, the type of demand and implications of the chosen demand will assist stakeholders in understanding the calculation in its entirety. Furthermore, Ergon Energy Retail considers it appropriate to include transitional measures to ensure the Australian Energy Market Operator has sufficient time to finalise the wording prior to the final updates to the Reliability Standard Implementation Guidelines being published.

Furthermore, Ergon Energy Retail suggests it would be useful to have clarification on the definition of the term 'generation' to clearly define whether it is being used 'as an asset' or 'as a concept' to ensure that stakeholders can understand the implications consistently.

Should the AEMC require additional information or wish to discuss any aspect of this submission, please contact me on 0467 782 350 or Barbara Neil on 0429 782 860.

Yours sincerely

A handwritten signature in cursive script that reads "Trudy Fraser".

Trudy Fraser  
**Manager Regulation**

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