



19 August 2021

Merryn York
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms York,

AEMC: GENERATOR REGISTRATIONS AND CONNECTIONS – DRAFT DETERMINATION

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback to the AEMC on the draft determination for the generator registrations and connections rule changes.

As noted in our submission to the consultation paper, the scheduling threshold should only be reduced if the impact of non-scheduled generation on the market is material and clear net benefits are identified. We therefore support the draft decision to retain the scheduling threshold at 30MW given the AEMC's findings that there would be no net benefits from reducing the threshold, given:

- The private costs to generators would outweigh the benefits.
- The improvements in forecast accuracy and central dispatch would not be of sufficient materiality.

We also broadly support the following changes as they will promote transparency and ensure generators that have a significant impact on the market are not exempt from registration:

- Clarifying AEMO's current practice of using the combined nameplate capacity behind a common connection point to assess scheduling requirements.
- Narrowing the exemption criteria for registration.
- Requiring AEMO to develop, maintain and publish guidelines.

However, we consider that transparency could be further improved by requiring AEMO to publish high-level reasons for exempting generators, subject to confidentiality. This would promote certainty and confidence in the framework.

Should you have any questions or wish to discuss this submission further, please contact Sarah-Jane Derby at Sarah-Jane.Derby@originenergy.com.au or by phone, on (02) 8345 5101.

Yours sincerely

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

Steve Reid
Group Manager, Regulatory Policy