

10 February 2022

Anna Collyer
Chair
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Ms Collyer,

**UPDATING SHORT-TERM PROJECTED ASSESSEMENT OF SYSTEM ADEQUACY (ST PASA) –
DRAFT DETERMINATION**

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback to the AEMC on the draft determination for the updating ST PASA rule change from AEMO.

Origin supports the introduction of a principles-based framework for ST PASA, including unit-level information provision, to provide AEMO more flexibility in short-term forecasting and improve transparency of information to support participants' operational decisions. We also support combining pre-dispatch and ST PASA for a seven-day outlook.

We note that the draft rule requires a two-stage consultation process (*Rules consultation procedures*) for the development and amendment of the new ST PASA procedures. We strongly support this element of the draft rule as it will ensure participants can effectively assess proposed changes to the procedures.

As stated in our submission to the consultation paper, we are concerned that changes to the definition of *PASA availability* with respect to recall times may lead to onerous and complex requirements being imposed on participants. The definition of *PASA availability* in the draft rule requires the specific details around recall times to be addressed in AEMO's Reliability Standard Implementation Guidelines. We reiterate that we do not support introducing a requirement for generators to provide distinct PASA availability for multiple AEMO-determined recall times per trading interval. Returning units to service is an operationally intensive task which involves uncertainty¹, this should be factored into any compliance obligations. At its November 2021 Stakeholder Update session on the ST PASA Replacement project AEMO stated it will consult further on generator recall notification, covering both current and possible future arrangements. We look forward to this consultation.

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

Yours sincerely,



Steve Reid
Group Manager, Regulatory Policy

¹ Significant maintenance works often involve activities that are not commonly conducted and hence there can be considerable uncertainty associated with returning units to service.