



EnergyAustralia

LIGHT THE WAY

17 October 2019

Mr Mark McLeish
General Manager (A/g), Market Performance
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

Lodged electronically: AERInquiry@aer.gov.au

Dear Mr McLeish,

AER – Proposed amendments to the rebidding and technical parameters guideline – Draft Decision

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EnergyAustralia is one of Australia's largest energy companies with around 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own, operate and contract an energy generation portfolio across Australia, including coal, gas, battery storage, demand response, solar and wind assets with control of over 4,500MW of generation capacity in the National Electricity Market (NEM).

We welcome the AER's consultation on changes to the rebidding and technical parameters guideline that are required following the AEMC's decision to implement 5 Minute Settlements.¹ We seek clarity on the intent of the proposed changes in *Section 3.4 Form of rebid* and recommend the AER more clearly articulate what is required under the rules and reference the respective clauses within the procedures.

The existing guidelines specify that

"The AER also recommends that the time when the relevant participant becomes aware of the change in material conditions and circumstances on the basis of which it decides to vary its dispatch offer or dispatch bid be included in the rebid reason in HHMM format."

The new guidelines specify that

"When relevant participants submit a rebid to AEMO, they must provide the time of the event(s) or other occurrence(s) adduced and a brief, verifiable and specific reason for the rebid. The... AwareTime...[and]...DecisionTime fields should be submitted in the following form:"

These changes imply that it will now be mandatory to provide *DecisionTime* information for every rebid. This is inconsistent with the requirements of the NER (Cl. 3.8.22(c), (ca) and (d)) and imposes additional reporting requirements on participants that are not related to the implementation of the 5 Minute Settlement rule change.

¹ <https://www.aemc.gov.au/rule-changes/five-minute-settlement>

For clarity, we suggest that the procedures more clearly articulate that

- *DecisionTime* is optional and *if* submitted it should be in the format specified in the guidelines. To avoid doubt, *DecisionTime* can be left blank to reflect the decision time to be the rebid time.
- *AwareTime* is optional, unless a rebid is made in the late rebidding period as per clause 3.8.22(ca)(iv).

If you would like to discuss this submission, please contact Georgina Snelling on 03 9976 8482 or by email Georgina.Snelling@energyaustralia.com.au.

Regards

Sarah Ogilvie

Industry Regulation Leader