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Mr Mark McLeish
General Manager (A/g) Market Performance
Australian Energy Regulator
GPO Box 520
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By email, AERInquiry@aer.gov.au

16 October 2019

Dear Mark,

Rebidding and Technical Parameters Guideline - Draft Decision

AGL Energy (AGL) welcomes the opportunity to comment on the Australian Energy Regulator's (AER) Rebidding and Technical Parameters Guideline Draft Decision (guideline).

AGL is one of Australia's leading integrated energy companies and the largest ASX listed owner, operator and developer of renewable generation. Our diverse power generation portfolio includes base, peaking and intermediate generation plants, spread across traditional thermal generation as well as renewable sources. AGL is also a significant retailer of energy and provides energy solutions to over 3.6 million customers in New South Wales, Victoria, Queensland, Western Australia and South Australia.

The AER proposes amendments to sections 2.1.1 and 3.4 of the guideline to align with the bid/offer submission format that the Australian Energy Market Operator (AEMO) will introduce for five-minute settlement (5MS).

AGL considers that the proposed section 3.4, which defines the form of a rebid, exceeds the scope of the National Electricity Rules (NER). Specifically, section 3.4 suggests that a rebid should include "eventTime", "reason", "category", "awareTime" and "decisionTime". The NER explicitly requires "eventTime" and "reason" to be recorded for all rebids (cl. 3.8.22(c)(2)) and requires "awareTime" to be recorded for late rebids (cl. 3.8.22(ca)).

A requirement to record a third timestamp in relation to a rebid or late rebid ("decisionTime") is only likely to cause confusion and lead to errors. AGL is keen to understand what benefit the AER sees in recording this information.

Clause 3.8.22(3) of the NER allows the AER to request "such additional information to substantiate and verify the reason for a rebid (including any record made under paragraph (ca)) as the AER may require from time to time". AGL does not consider that this clause allows the AER to impose additional record keeping requirements across all rebids.

The guideline states that its purpose is to inform participants of the AER's approach to relevant obligations, including monitoring and enforcing compliance with the NER regarding rebidding and technical parameters



obligations. In our view, the guideline should not attempt to extend NER obligations. Additional rebidding requirements, beyond those currently stated in the NER, should be pursued through a rule change process.

If you have any queries about this submission, please contact Liz Gharghori on (03) 8633 6723 or lgharghori@agl.com.au.

Yours Sincerely,

Chris Streets

Senior Manager Wholesale Market Regulation