



7 October 2022

Australian Energy Market Operator

Submitted via email to: NEM.Retailprocedureconsultations@aemo.com.au

Dear Sir/Madam

**First Stage Consultation
Unaccounted for Energy Reporting Guidelines**

Stanwell Corporation Limited (Stanwell) welcomes the opportunity to respond to the Australian Energy Market Operator's (AEMO's) First Stage Consultation on Unaccounted for Energy Reporting Guidelines.

We acknowledge the work of AEMO in preparing this consultation paper and we thank AEMO for the opportunity to provide a response.

This submission contains the view of Stanwell and should not be construed as being indicative or representative of Queensland Government policy.

As a major provider of electricity to Queensland, the National Electricity Market (NEM) and large energy users throughout Australia, Stanwell is invested in providing reliable and affordable energy for today and into the future. We are currently exploring new generation and storage technologies to help reduce emissions and ensure Queensland electricity supply remains secure and reliable now and into the future.

Stanwell supports the transition from settlement by difference to Global Settlements (GS) as a more equitable way to share the cost of Unaccounted for Energy (UFE) across all consumers rather than only those with a Tier 1 Retailer.

The continuous improvement (reduction) in UFE for the benefit of consumers should be a key goal for all parties, which is why the content in the UFE Reporting Guideline is so important. Presently, the UFE Reporting Guideline is the only avenue for market participants to have access to the bigger picture of what is occurring within a local area. Without the right information being provided at the appropriate granularity, the collaborative task of identifying, investigating and developing actions to reduce high UFE between market participants and AEMO would not be possible.

Our response to AEMO's First Stage Consultation on the UFE Reporting Guidelines is detailed in the attached Participant Response Template. Our main feedback to AEMO's proposed UFE Reporting Guidelines are:

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- An annual report for UFE is not frequent enough and Stanwell recommends a quarterly report where data is aligned with each quarter of the financial year;
- The proposed charts do not address the necessary parameters at the appropriate level of granularity (i.e. 5 minute interval), to enable AEMO and market participants to analyse and verify UFE. Stanwell has proposed a range of parameters we would like to see in the UFE reporting guideline to investigate, analyse and communicate to our customers the contributing factors to UFE;
- Until sufficient information on UFE is provided to market participants, it is too early to comment on actions to reduce UFE; and
- Finally, while the additional information requested for the Guidelines are extremely important for market participants, Stanwell continues to submit, it is AEMO's ongoing responsibility to investigate, analyse UFE data to reduce UFE charges over time.

Stanwell appreciates the opportunity to contribute to AEMO's First Stage Consultation on the UFE Reporting Guidelines and we look forward to working with AEMO on further developments of the proposed content of the UFE Reporting Guidelines.

Should AEMO wish to discuss our submission in more detail, please contact Zi Ying Koh on (07) 3228 4137 or email ZiYing.Koh@Stanwell.com

Yours sincerely



Ian Chapman
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Stanwell