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AEMO – Reliability Forecasting guidelines and methodologies consultation

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3 March 2023

AGL Response to AEMO Reliability Forecasting guidelines and methodologies consultation

AGL Energy (AGL) welcomes the opportunity to comment on AEMO's Reliability Forecasting guidelines and methodologies consultation draft report (draft report).

The draft report sets out several changes to a series of AEMO forecasting guidelines and methodology documents.

Outlined below is our response to two proposed changes arising through this consultation; the amendment of the committed generation project criteria for the ESOO and reliability forecasting, and the amendments to the MT PASA process description.

Generating and integrating resource systems commitment criteria

We agree with AEMO's proposal to amend the commitment criteria to further improve the accuracy of forecast connection of new generators and integrating resource systems. The current criteria are unnecessarily inflexible given the improved confidence of commissioning times of new types of facilities, such as batteries.

Further, we accept the commercial and practical challenges of connecting new facilities mean AEMO must find a balance between including projects that are expected to be available during the forecast period and uncertainty of timing due to yet to be resolved factors.

We support the proposed changes set out in the draft ESOO and Reliability Forecast Methodology document. The now revised 6 month delay on the availability of committed* projects and the inclusion of anticipated projects is a pragmatic and reasonable approach. AEMO discretion is necessary given each project should be considered on a case by case basis as the outstanding factors that lead to commissioning will vary significantly.

MT PASA process description draft guideline (draft guideline)

AEMO has proposed changes to MT PASA reporting to meet the Enhancing information on generator availability rule change. The proposed changes include new unit status reason codes and recall time information requirements where required.

Broadly we agree with AEMO's approach to preserve the current MT PASA reporting framework and to incorporate this rule requirement by adding additional reporting fields and a separate AEMO report on unit status.

We support the proposed definitions from the IEEE 767-2006. The reasons are sufficiently clear and granular to meet the transparency requirements. However, we request AEMO provide clarification in the draft guideline as to how a market participant should report a generator forced outage where the maintenance to rectify the fault is delayed for economic reasons.



We also support the proposed approach to recall times when the unit is unavailable during an outage.

Production unit capabilities for MT PASA

We note an additional paragraph has been added to the section 3.1.1 of the draft guideline.

The additional text states:

“Energy limits should reflect output limits of scheduled generating units and scheduled bidirectional units. Energy limits must represent sustainable weekly limits that reflect the long term capability of the plant, not a limit for the week considered in isolation. For example, the impact of an energy limit being reached should not fully or near-fully deplete energy availability for subsequent weeks.”

The draft report does not appear to provide commentary on the purpose of this additional paragraph. We request AEMO provide an explanation as to the meaning this paragraph for hydro generators reporting requirements.

If you have any queries about this submission, please contact Kyle Auret on (03) 8633 6854 or KAuret@agl.com.au.

Yours sincerely,

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