

AGL Energy Limited ABN: 74 115 061 375 Level 24, 200 George St Sydney NSW 2000 Locked Bag 1837 St Leonards NSW 2065 t: 02 9921 2999 f: 02 9921 2552 agl.com.au

Suzette Lizamore AEMO GPO Box 2008 Melbourne VIC 3001 Via email: Suzette.Lizamore@aemo.com.au

28 June 2017

Dear Ms Lizamore,

## Reliability Standard Implementation Guidelines Draft Report and Determination

AGL welcomes the opportunity to comment on AEMO's Reliability Standard Implementation Guidelines Draft Report and Determination (Report).

AGL is one of Australia's leading integrated energy companies and 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 generation fuel sources as well as renewable sources. AGL is also a significant energy retailer, providing energy solutions to over 3.7 million customers throughout eastern Australia.

AGL is supportive of AEMO's proposed changes to the procedures, with the exception of AEMO's proposal to obtain auxiliary load information from participants. The Report states that AEMO currently estimates this data and is requesting obtaining this information from participants to increase the accuracy in accounting for auxiliary load in the MT PASA process. AGL considers placing this requirement on participants to provide this data, which is variable according to load, would be overly onerous and ignores other sources of accurate auxiliary load information. For example, AEMO should be able to calculate accurate auxiliary load data from the SCADA and settlement data they hold.

If you have any queries about the submission or require further information, please contact Brigid Richmond at <a href="mailto:bright:b

Yours sincerely,

Simon Camroux Senior Manager, Wholesale Regulation