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10 November 2016

Clare Greenwood Energy Forecasting Australian Energy Market Operator GPO Box 2008 Melbourne VIC 3001

Via email: Op.forecasting@aemo.com.au

Dear Ms Greenwood

Re: Submission to AEMO Energy Conversion Model Guidelines Consultation - Third Stage

The AER welcomes the opportunity to comment on AEMO's Second Draft Report and Determination relating to amendments to the Wind Energy Conversion Model Guidelines and the Solar Energy Conversion Model Guidelines.

We support the further work AEMO and market participants have undertaken to identify improvements to the accuracy of Australian Wind Energy Forecasting System (AWEFS) forecasts, outputs of which are used in the calculation to determine dispatch targets.

We acknowledge AEMO's response to our submission on the First Draft Report and Determination, including:

- adding the word "technical" to the first sentence of the SCADA Local Limit definition, in response to the AER's submission that it should be a technical parameter
- indicating AEMO's intention to investigate the possibility of Semi-Scheduled Generators bidding their availability for Dispatch and Predipatch through NEMDE as well as potential improvements to the useability of the EMMS Portal for Intermittent Generation for PASA, thereby providing transparent commercial information to the market.

We support the further work AEMO and other participants have undertaken in relation to the inclusion of the 'SCADA Estimated Power' parameter as a potential replacement of the AWEFS dispatch forecast.

We consider that the comprehensive inputs from across the wind farm should ensure that the SCADA Estimated Power parameter accurately represents the wind farm's performance.

As per the 'SCADA Local Limit' definition, we consider that this should be a technical parameter only. To this end we note AEMO's inclusion in the definition of SCADA Estimated Power that it is 'subject only to technical factors affecting operation of its generation and connection assets'. We agree that the submitted data should be well scrutinised and compared to the outputs from AWEFS.

If you have any queries about the issues raised in this submission, please contact Craig Oakeshott ((08) 8213 3469; Craig.Oakeshott@aer.gov.au).

Yours sincerely

Joanna Gall Director Wholesale Markets

Sent by email on: 10.11.2016