

31 March 2026

AER

Submitted via email:

Dear Australian Energy Regulator (**AER**),

Submission: AER's Rebidding and Technical Parameters Guideline

CS Energy welcomes the opportunity to provide a submission to *AER's Rebidding and Technical Parameters Guideline* released for consultation on 3 March 2026.

About CS Energy

CS Energy is a Queensland Government owned corporation that provides power to some of the State's biggest industries and employers. We generate and sell electricity in the wholesale and retail markets, and we employ over 700 people who live and work in the regions where we operate.

CS Energy owns thermal power generation assets, and we are building a more diverse portfolio. We also have a renewable energy offtakes portfolio of almost 300 megawatts, which we supply to our large commercial and industrial customers in Queensland. CS Energy is developing a 400 MW gas-fired peaking generator at Brigalow near Kogan Creek in Queensland.

Overall views

CS Energy welcomes the opportunity to provide feedback on the AER's Rebidding and Technical Parameter Guidelines. As the National Electricity Market (**NEM**) transitions to net zero, the volume and validity of the inputs used to inform participant decision making will continue to grow at an unprecedented rate. The use of auto-bidders and AI-driven algorithms, now widespread and solidified across the market, have provided a means to analyse large volumes of data in a timely manner.

As such, it is more imperative now than ever that sufficient guidance and visibility is provided to participants regarding the use of such software. It is equally important to acknowledge instances where the existing bidding guidelines have, and foreseeably will continue to, provide ample information for participant decision making.

Auto-Bidder Categorisation

Brisbane Office
PO Box 2227
Fortitude Valley BC Qld 4006
Phone 07 3854 7777
Fax 07 3854 7300

Callide Power Station
PO Box 392
Biloela Qld 4715
Phone 07 4992 9329
Fax 07 4992 9328

Kogan Creek Power Station
PO Box 41
Brigalow Qld 4412
Phone 07 4665 2500
Fax 07 4665 2599

CS Energy supports the proposal of creating an auto-bidder category to provide the market with greater transparency over the use of said software. Given the sheer volume of bids from each unit on any given day, transparency regarding what was an algorithm-based versus a human-made decision has begun to blur. Better visibility over these inputs would facilitate more informed market analysis and strategy development, improving competition and outcomes for consumers.

Compliance and Monitoring

As the use of auto-bidders grows, it is imperative that these tools are regulated appropriately. CS Energy welcomes the proposal to introduce obligations on participants to certify, test, govern and record the use of auto-bidders. Likewise, the proposal to require participants to have the ability to suspend, limit or amend an auto-bidder is sensible. This development will ensure operators have appropriate control over the software they employ, ensuring that bids are compliant.

CS Energy supports the recommendation to extend the compliance obligation to software developers. All registered participants and providers of the auto-bidding software should be held equally accountable, in upholding compliance and orderly market activity. Ensuring software is compliant before offering it to the market, through a certification mechanism, will provide participants with greater confidence when sourcing a provider that their use will in line with existing guidelines.

MSOL Guideline

CS Energy considers that the current guidelines for determining a unit's minimum safe operating level (**MSOL**) strike an appropriate balance between specificity and flexibility, allowing operators to make informed decisions about the condition of their plant. These guidelines remain flexible to account for the dynamic nature of a unit's MSOL while also retaining rigidity in the prioritisation of safety and plant condition.

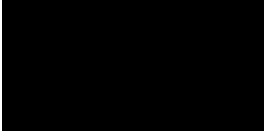
Expanding the guidelines or developing more prescriptive criteria would be unnecessarily complex and burdensome. The existing guidelines clearly state that the MSOL should reflect technical and plant safety considerations, *not commercial conditions*. There is no ambiguity in this assertion, and as such, CS Energy does not consider that there is need to elaborate.

Moreover, the proposal for participants to seek an engineering assessment to certify a plant MSOL would be a costly and impractical arrangement. The frequency of changes to MSOL is unpredictable and plant specific. As such, it would be costly for participants to conduct an engineering assessment each time operators suspect a change in MSOL. Prudent operators will already conduct routine engineering assessments to inform their understanding of plant MSOL; any additional inspections would be unnecessary.

Closing Remarks

CS Energy is hopeful that these changes will facilitate more compliant and transparent bidding arrangements. If you would like to discuss this submission, please contact Hunter Finlay, Policy & Regulation Graduate, at [REDACTED].

Yours sincerely



Dr Alison Demaria
Head of Policy and Regulation