13th April 2026

Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601
Lodged via email: AERCompliance@aer.gov.au

RE: Updates to the AER's Rebidding and Technical Parameters Guideline

Neoen welcomes the opportunity to provide our comments on the 2026 Review of the Rebidding and Technical Parameters Guideline consultation paper.

Neoen is one of the world's leading renewable energy companies, with expertise in solar and onshore wind power and storage. Neoen plays an active role in accelerating the energy transition in Australia by delivering clean, competitively-priced local energy.

Neoen has contributed over 5GW of renewable energy assets in Australia, and currently operates close to 20 assets including over 1.5GW of storage. Its flagships include Western Downs Green Power Hub (460MW_p, 540MW/1080MWh) in Queensland; Collie Battery 1&2 (530MW/2240MWh) in Western Australia; and the Hornsdale Power Reserve (150MW/194MWh) in South Australia.

Our responses to Questions 8-16 in the consultation paper regarding guidelines for Artificial Intelligence and Auto-Bidding can be found below.

Should you have any questions or seek to follow up this submission at any time, please do not hesitate to contact us. We look forward to engaging with the AER and stakeholders further on this.

Kind regards,

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Neoen Australia

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UTILISATION OF AUTOBIDDING

Question 8. Do you consider additional guidance relating to the expectations for Market Participants utilising Auto-bidding software (including third party software), and for the third party providers would be useful? If so, what guidance would be of assistance?

We support clarification of expectations for market participants and third parties using auto-bidding systems - in particular, around the level of "appropriate oversight" a market participant is expected to maintain when utilising third-party bidding systems.

We consider that any guidance should remain principles-based and technology-neutral. In practice, there is often not such a clear distinction between manual and automated bidding. Typically, participants can define and change certain objectives or constraints, while systems execute, optimise, validate, and submit the bids – acting as a human-driven tool rather than a fully autonomous system. However the relationship can look very under different settings; for example, these same tools could at times just be used to format or fill in less relevant parameters (e.g. FCAS trapeziums, PASA) of an otherwise manually generated bid. The spectrum of tools blur the line between manual and automatic. Due to this ambiguity, our view is that it would not be appropriate to attempt to make this distinction from a compliance perspective.

Question 9: Do you consider there would be any benefit from adding additional transparency on the utilisation of Auto-bidding in a rebid reason? Why?

We do not believe that this additional visibility would be materially beneficial to the market or regulators, beyond the minor benefit of identifying which market participants are using auto-bidders.

From a compliance perspective, it is unclear how this distinction would improve the AER's ability to assess whether a rebid is valid and compliant. The relevant consideration is the quality and legitimacy of the rebid reason, not the mechanism used to generate it. In practice, many bids reflect a combination of automated processes and human inputs, making any binary classification ambiguous and potentially misleading.

Implementing such a change would create an administrative burden for market participants and add to the challenges of handling such volumes of data raised by the AER in this consultation. We consider that any expansion of data collection should be clearly justified by a specific and demonstrable regulatory use case, rather than introduced as a precautionary measure.

Question 10. Explain whether the proposed methodology for receiving this information listed above would be effective in providing market transparency.

See response to question 9.

REBIDDING OF BATTERIES

Question 11. How could the volume of battery rebids (particularly when we are seeing numerous rebids within the same dispatch interval) be reduced, whilst maintaining the necessary market integrity?

We do not support restrictions on rebidding frequency. The information that guides a battery's bidding can change throughout the course of a 5-minute dispatch interval; for example, an asset could develop technical issues or there could be a latency in one of the many data streams that guides decision making. It is essential for both compliance and market efficiency that participants are not limited in their ability to respond to these changes and update their bids accordingly in real time.

Regarding concerns about the volume of battery rebids, we consider that much of the informational burden may be caused by the retention of un-used or superseded rebids that have little informational value to the

market. Where multiple rebids have been made in an interval, it is only the final bid that may go on to affect AEMO's price formation and/or predispatch forecasting.

Question 12. Do you consider there are any changes to the requirements for the recording of contemporaneous notes for battery rebids that could be implemented to help to reduce regulatory burden whilst still providing necessary integrity?

None identified at this stage.

AI UTILISATION IN THE NEM

Question 13. What are your views regarding the utilisation of AI in Auto-bidding technology? What do you consider the potential benefits and harms as this technology becomes more utilised and sophisticated?

We consider auto-bidding to be a critical enabling tool for our NEM operations. The NEM is by design a much more dynamic and volatile energy market than many others in the world, and the capability to continuously re-optimise is essential for the performance of flexible assets and storage. We see the auto-bidding as crucial to supporting the efficient operation of a highly renewable and storage-based system.

We consider that there could be a negative impact on overall market outcomes if a large enough share of assets come to rely on the same third-party autobidding software without appropriate ringfencing. Any limitations on market power must, however, consider the relative power held by large portfolios today.

Question 14. How can the AER ensure sufficient transparency and accountability of technology being utilised for bidding and rebidding?

We consider that any amendments should be technology-neutral and outcomes-based.

We do not support the suggested obligations to externally certify, test, govern, record, and maintain the ability to suspend any autobidding and/or AI models. Robust internal development, testing, and governance processes are already standard practice for these systems. Imposing external requirements would create significant operational burden, and materially harm participants' ability to respond to dynamic market conditions.

The proposed obligation to "have the ability to suspend, limit or amend each Auto-bidding and AI model at any time" is particularly concerning as we consider these tools to be absolutely necessary to manage the complexity of operating a portfolio across multiple regions, markets, and assets.

Question 15. What, if any, amendments to the NER are required to address the utilisation of AI in the bidding process?

See response to question 8.

Question 16. Do you consider there are AI issues that are directly relevant to the Guideline which require it to be amended? If so, how?

None identified at this stage.