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Submitted to AERcompliance@aer.gov.au

RE: 2026 review of the Rebidding and Technical Parameters Guideline

About Shell Energy in Australia

Shell Energy provides the energy businesses and households need for today and tomorrow.

A generation-backed trader and energy retailer, Shell Energy powers businesses and homes and acts as a catalyst for change to positively impact Australia's energy future.

We provide electricity, gas, and innovative solutions for our customers, complemented by our portfolio of gas-fired peaking power stations and battery storage assets, which support energy security and reliability.

Shell Energy is Australia's largest electricity retailer to commercial and industrial businesses, recognised for our market-leading customer service1. We offer business electricity, gas, and smart energy solutions. Our residential business, Powershop, provides greater choice and confidence to households and small businesses to help them take control of their energy through multiple energy plan options and digital tools.

General Feedback

Question 2 and 3: IPRR and treatment of passive load

Shell Energy supports improving the visibility of price responsive and passive load in bids. Both options outlined in the consultation could address the issue in practice. However, the use of a secondary settlement point is a more robust structural solution because it separates passive and responsive load at the metering level, making passive load explicitly visible. This enables more accurate forecasting and more efficient dispatch and aligns with the objectives of the Integrating Price Responsive Resources reform, which identifies transparency of unscheduled price responsive resources as essential to improving short term demand forecasting and market efficiency.[1]

Treating passive load as an "abnormal operating requirement" under NER 3.8.19 would allow a Voluntarily Scheduled Resource Provider to bid inflexibly at a fixed consumption level equal to its passive load, but it does not create visibility. The passive load remains hidden and must be inferred through inflexibility bids. This provides less transparency than the preferred structural approach and limits the usefulness of the framework.

Question 6: guidance on ramp rates

The guideline should align directly with the National Electricity Rules. Ramp rate obligations are defined in NER clause 3.8.3A, which requires participants to submit up and down ramp rates that meet or exceed the applicable minimum ramp rate unless a physical or safety based- constraint prevents the unit from achieving it.[2] The clause sets explicit minimum ramp rates, including the 3 MW per minute threshold for scheduled loads and scheduled network services, and generating -unit specific minimums.[3] Clause 3.8.3A(c) permits ramp rates below

[1] AEMO, Integrating Price Responsive Resources into the NEM (IPRR) overview and final rule framework.
[2] NER clause 3.8.3A ramp rate obligations, AEMC.
[3] NER clause 3.8.3A detailed minimum ramp rate requirements and clause 3.8.3A(c) exception conditions.

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the minimum only where engineering or physical conditions prevent safe operation at or above the minimum.[4] The AER Rebidding and Technical Parameters Guideline also reflects the requirement to observe minimum safe operating levels when setting ramp rates.[5]

For clarity, is it therefore our view that the guideline should:

- reinforce that rebidding ramp rates to zero is only permissible when at minimum safe operating level or due to genuine engineering constraints
- avoid creating any new restriction on rebidding to the minimum allowable ramp rate, which remains an important and unconditional right under the NER
- ensure participants remain able to rebid to the minimum threshold (such as 3 percent of maximum operating level or 3 MW per minute), consistent with the rule requirements

If assets, and particularly grid-scale batteries, are restricted from using legitimate ramp-rate strategies during constraints, broader adverse market effects may flow through. This could include increased spot price volatility, more frequent high-price events, greater risk-adjusted pricing by traders, and higher cap premiums.

Question 8 – third party responsibility

We support clarifying expectations in relation to the use of third-party software providers for bidding and rebidding. Consistent with the Rules and this Guideline, accountability for compliance remains with the registered market participant.

The Guideline could be strengthened by more clearly emphasising this responsibility, including the expectation that registered participants ensure any third-party providers acting on their behalf are aware of and operate consistently with the Guideline. Where appropriate, access to targeted educational resources could be facilitated by the AER to support participant engagement with third-party providers.

Question 9 and 10 – rebid reasons and transparency

We acknowledge the Guideline requirement that rebid reasons be brief, verifiable, and specific, and that they focus on the most material reason for the rebid. This remains a critical principle supporting transparency and compliance.

As bidding practices evolve, including through increased use of automated bidding solutions, additional targeted clarification or education from the AER on the practical application of this standard may be beneficial. In automated contexts, rebids may legitimately be triggered by changes in AEMO predispatch forecasts, which can materially alter expected dispatch profiles, forecast state of charge, and available energy for battery energy storage systems. Participation in regulation services can also impact utilisation and energy availability and require rebids.

These dynamics reinforce the importance of ensuring that rebid reasons clearly articulate the primary driver for the rebid in a manner consistent with the Guideline, irrespective of whether bidding decisions are made manually or through automated systems. Clarifying expectations in this area would help promote consistent interpretation and implementation across the market.

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[4] NER clause 3.8.3A detailed minimum ramp rate requirements and clause 3.8.3A(c) exception conditions.

[5] AER Rebidding and Technical Parameters Guideline (October 2024) minimum safe operating level references.

Question 11: volume of battery rebids

We propose a more cautious, data driven approach to an assessment on a limit to battery rebid volumes. Higher rebidding activity can reflect normal operational requirements for managing state of charge and responding to rapid market changes. Before considering any cap, it may be prudent for the AER to first undertake a targeted review to understand the drivers of increased rebid volumes and whether they create meaningful system or dispatch issues.

If the evidence shows that rebid volumes are affecting market efficiency or risks creating congestion in AEMO's bidding systems the AER could then consult on an appropriate, data-driven threshold that reflects the operational characteristics of batteries and automated bidding. This would complement the AER's rebidding guidelines, which already set expectations for clarity, substance and operational relevance in rebid behaviour.[6]

Any future measure should focus on operational clarity and timing rather than restricting legitimate flexibility. This would ensure that any intervention is justified, proportionate, and aligned with the existing rebidding framework.

Shell Energy welcomes further engagement on this topic. If you have any questions or would like further details relating to this submission, please contact Brett Crossley at [redacted].

Yours sincerely,

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[6] AER Rebidding and Technical Parameters Guideline (various editions including 2009 and 2019)