



EnergyAustralia

16 January 2017

Mr Peter Adams
General Manager – Wholesale Markets Branch
Australian Energy Regulator
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Dear Mr Adams

Lodged by email: AERInquiry@aer.gov.au

AER Draft Decision - Rebidding and Technical Parameters Guideline January 2017

EnergyAustralia is one of Australia's largest energy companies with over 2.5 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market.

EnergyAustralia appreciates the opportunity to provide further input into the proposed amendments to the Rebidding and Technical Parameters Guideline. We reiterate our support for the AER's provision of guidance to the industry on this matter, and we appreciate that many of the issues raised in our previous submission have been revised in the current draft guidelines. However, we continue to have some concerns in relation to the proposed form of rebid proposed in section 3.4.

It remains EnergyAustralia's position that the inclusion of the second timestamp in the proposed form of rebid proposed requires more information to be provided to AEMO than required by the Rules. Participants are only expected, under the Rules, to provide the relevant information to the AER upon written request and as required from time to time.

While we understand the rationale behind seeking a consistent approach to all rebids, we note that the retraining costs and cost to adjust systems are not the only issue raised by this guideline requirement. In cases where the second timestamp is not legally required (i.e. not made in the late rebidding period), and is omitted for other operational reasons we are concerned that we will be asked to provide this detail as a matter of practice. This could add regulatory burden even when the information required under the guideline would be immaterial, or not obligated to be provided under the Rule.

If you would like to discuss this submission, please contact me on (03) 8628 1393.

Regards

Chris Streets

Industry Regulation Lead