



7 December 2020

Craig Oakeshott
Market Performance Branch
Australian Energy Regulator

Lodged by email: RRO@aer.gov.au

Dear Mr Oakeshott,

Reliability instrument request for New South Wales

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the reliability instrument request for New South Wales.

We understand that AEMO has provided the AER with a T-3 reliability instrument request for a forecast reliability gap in the NSW region for weekdays between 3-8pm in January and February 2024. The forecast reliability gap is 154 MW.

We have two main points to raise regarding the modelled shortfall in NSW:

- Materiality of modelled gap – in our view, a modelled shortfall of 154 MW in the context of an estimated peak event of 13,710 MW is not material and is within the margin of error of the modelling exercise. The period in question is over three years in advance and subject to considerable uncertainty.
- New information is material – since the ESOO was released in August 2020 the NSW Government has released a significant package of reforms to underpin new investment in the NSW market. This policy has now been legislated and should be considered in modelling the supply demand balance in the NSW region.

For the purposes of disclosure, Origin is a deemed Market Liquidity Obligation (MLO) generator under the RRO rules for the NSW region. However, we are already performing a similar function through our voluntary market maker arrangements with the ASX.

If you wish to discuss any aspect of this submission further, please contact Matthew Kaspura at matthew.kaspura@originenergy.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "K. Robertson".

Keith Robertson
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