

23 May 2019

Thomas Lozanov
Project Leader
Australian Energy Market Commission (AEMC)

Submitted via website: www.aemc.gov.au/contact-us/lodge-submission

Dear Mr Lozanov

Transparency of new projects (ERC0257)

Thank you for the opportunity to respond to the transparency of new projects consultation paper.

Stanwell supports all three rule changes and agrees with the AEMC's approach of combining the rule changes. Each rule change seeks to increase the transparency of, or access to information for, new generation projects. This is particularly important given the current large volume of proposed projects.

Stanwell regularly uses the Australian Energy Market Operator's (AEMO's) Generation Information Page for supply, constraint and marginal loss factor forecasting. While the current resource is helpful, we often find information which is outdated or inaccurate. This includes information withheld due to AEMO's confidentiality restrictions even though information is already in the public domain. We also find it difficult to track projects between publications as there is no unique ID associated with each project and other identifying features often change. We therefore support the Australian Energy Council's (AEC's) rule change which proposes an obligation on Intending Participants to update AEMO through its portal¹ when there is a change to their proposed project.

Stanwell has also attempted to conduct tripartite negotiations with a Transmission Network Service Provider (TNSP) and a new generation project regarding connection requirements. This has proven very difficult due to the TNSP's confidentiality restrictions relating to connection applications. Stanwell's experience is a perverse outcome given the topic of the tripartite negotiation was an attempt to reduce overall system costs through sharing resources and existing infrastructure and the parties were already aware of each other's projects. Therefore Stanwell supports the Energy Networks Australia (ENA) rule change which obligates TNSPs to publish connection application information. Furthermore, this would allow TNSPs to publish information relevant in foreshadowing potential congestion concerns as raised in the Coordination of Generation and Transmission Investment, helping inform investment decisions.

¹ Stanwell understands the development of AEMO's portal is largely complete and therefore will not impact the delivery of five minute settlement.



Stanwell also supports the AEMO rule change which allows developers to register with AEMO and thereby receive power system information from AEMO. Stanwell considers the possibility that existing generators are impacted by the sharing of this information with “fly by night” developers to be marginal. Any information that developers access via AEMO will also be bound by the same confidentiality requirements that exist for Intending Participants. The benefit to existing generators of this rule change is it provides transparency on early stage projects that are currently not captured. By allowing developers to register with AEMO they can be obligated to provide updated information to AEMO, for publication through the Generator Information Page, as proposed by the AEC.

Stanwell proposes the rule changes be combined in the manner summarised in the attachment. The highlighted sections are proposed new requirements.

Stanwell welcomes the opportunity to further discuss this submission. Please contact me on (07) 3228 4546.

Yours sincerely

Jennifer Tarr
Manager Market Policy and Regulatory Strategy

Attachment – Stanwell’s proposed approach to increased new project transparency

Anticipatory Intending Participant	Intending Participant	AEMO	TNSP	AEMO’s portal	AEMO’s Generation Information Page
New registration category for developers.	Current registration category.	Assesses applications for Anticipatory Intending Participants.	Receives Connection Applications from Intending Participants.	Online portal which allows uploading and updating of project information.	A live resource accessible at any time for up to date project development information.
Assessed by AEMO through a less stringent registration process.	Assessed by AEMO through current Intending Participant registration process.	Assesses applications for Intending Participants.	Connection Application to be accompanied by unique project ID as issued by AEMO.	Obligation to update the portal on Anticipatory Intending Participants, Intending Participants and TNSPs.	Quarterly snapshot of data to be published through AEMO’s Quarterly Insights. No other reporting obligations on AEMO due to the live resource.
Obligated to provide updated project information into AEMO’s portal in accordance with AEC rule change.	Obligated to provide updated project information into AEMO’s portal in accordance with AEC rule change.	Issues unique ID to each project to enable tracking through Generation Information Page and TNSP Connection Application.	Connection Application to be accepted only from current Intending Participants. This ensures the transparency obligations on new projects are enforceable. If an Intending Participant is de-registered, the project will need to reapply for AEMO	Data uploaded and updated against a unique project ID.	

			registration and re-submit the TNSP connection application.		
Anticipatory Intending Participants to be de-registered if it is found that they do not provide updated information to AEMO.	Intending Participants to be de-registered if it is found that they have not provided updated information to AEMO.	Provides power system information to Anticipatory Intending Participants.	Uploads Connection Application information to AEMO's portal on receipt of application.	Data feeds into Generation Information Page.	
		Provides power system information to Intending Participants.	Responsible for updating AEMO's portal for changes in Connection Application information.	Clear data standards such as whether to submit capacity in MW DC or MW AC.	
		Maintains online portal for easy input of data by Anticipatory Intending Participants, Intending Participants and TNSPs.			