

INTRODUCTION

The Energy Users Association of Australia (EUAA) is the peak body representing Australian energy users. Our membership covers a broad cross section of the Australian economy including significant retail, manufacturing and materials processing industries. Combined our members employ over 1 million Australians, pay billions in energy bills every year and are desperate to see all parts of the energy supply chain making their contribution to the National Electricity Objective.

Our members are highly exposed to movements in both gas and electricity prices and have been under increasing stress due to escalating energy costs. These increased costs are either absorbed by the business, making it more difficult to maintain existing levels of employment or passed through to consumers in the form of increases in the prices paid for many everyday items.

The EUAA welcomes this draft rule change.

Improving the transparency around the pipeline of new generation projects will keep market participants well informed and enable them to make operational and investment decisions based on more accurate information. Providing this through the AEMO generator information page will facilitate greater coordination between generators — making it easier for generators to collaborate to address issues such as system strength. It will also assist with AEMO's operational and forecasting processes. This will ultimately benefit consumers in lower prices. Consumers are not supportive of the current system where the confidentiality provisions can lead to multiple generators connecting in the same region, resulting in a large MLF risk that the generators are now seeking to pass onto consumers through the current rule change proposal.

We make the following specific comments on the Draft. They are driven by the view that the earlier the changes are implemented the larger the benefits to consumers.

1. *The information published by AEMO should include information on current projects under consideration by TNSPs*

The proposed start date of 31st October 2019 means that all the projects currently being considered for connection and access agreements with TNSPs will be excluded. With only new applications after the start date included, the benefits of the transparency measure will only be seen some years in the future when post 31st October projects are built (or not built).

The Draft highlights the 50GW of proposed new generation that is at various stages of development that it seems will be not covered by the Draft rule. While the information on these projects has been provided to TNSPs under the current confidentiality rules, we would urge the Commission to consider options for this information to be made available through this new rule e.g.

- Are there any binding legal impediments preventing disclosure of information on the projects currently being considered by TNSPs?
- Could the information on projects be made public if the proponents agree?

2. *The transitional period should be shortened*

We think the proposal to delay in publication until 27th February 2020 is too long. While we understand the need to develop guidelines for the information to be provided on the generator information page, we think that at least some information could be made available prior to February 2020. This could involve:

- the development of a simple guideline to enable information to be published in a summary form earlier, and
- in parallel the development of a more detailed guideline that would lead to the comprehensive information being published from 27th February 2020

Please contact me if you would like to discuss this submission further.

Sincerely,



Andrew Richards
Chief Executive Officer