

AEMO PRICE RESPONSIVE REPORTING GUIDELINES - DRAFT FOR CONSULTATION

17 JUNE 2025

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our membership covers a broad cross section of the Australian economy including significant retail, manufacturing, building materials and food processing industries. Combined our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

Thank you for the opportunity to make a submission under the AEMO Price Responsive Reporting Guidelines - Draft for Consultation.

We are supportive of the type of reporting that is now required of AEMO under the *National Electricity Amendment (Integrating price-responsive resources into the NEM) Rule 2024*, however we are disappointed that AEMO has interpreted the new Rule in a minimalist fashion, without taking into account the intent of the new Rule as detailed in AEMC's Rule Determination.

We understand AEMC's intent is to open up AEMO's transparency to enable trust to be built between AEMO, market participants and consumers. The current Draft Responsive Reporting Guidelines does not achieve this.

As a fundamental *modus operandi*, we would encourage AEMO to think more about how the reporting would be used and therefore what is required in that reporting. As an example, the new *NER 3.10C.2b(ii)* states:

"patterns in forecast deviations, including to the extent identifiable, the approximate contribution of unscheduled price responsive resources to forecast deviations, in response to forecast and actual spot prices"

This does not say that only forecast and actual spot prices should be compared, but that forecast and actual prices is one of the comparisons, not the only comparison. In this example, a comparison of the forecast and actual prices is not useful unless compared to the forecast and actual dispatch of PRR in the context of total underlying demand (and their forecasts and actuals). Telling half the story only delivers half the meaning.

From that perspective, all relevant forecasting parameters (e.g. total underlying demand, total PRR dispatch and market price) should be compared to the actual dispatch outcomes and should be included in both the quarterly and annual reporting.

Without these fundamental reporting lines of the whole story, there is not much point in AEMO preparing the reports and AEMO's reputation for lacking transparency and the market participants and consumers lack of trust in AEMO will continue.

During this “messy middle” of the energy transition, market participants and consumers alike are looking to peak bodies like AEMO to provide clarity and transparency so that better decision making, and investment can occur.

The EUAA welcomes further discussions around the issues raised in this submission.

Do not hesitate to be in contact with EUAA Policy Manager Dr Leigh Clemow, should you have any questions.



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