SUBMISSION

AEMO SECURITY ENABLEMENT PROCEDURES CONSULTATION PAPER

10 APRIL 2026

INTRODUCTION

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our members are the engine room of the Australian economy, producing many of the products that households and business use every day including bricks, glass, steel, aluminium, paper, food and beverages. 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.

EUAA members are focussed on making products that meet their own customers' requirements where energy is just one input to the process albeit a critical one. Their expectation is that the energy industry continues to provide energy services that are fit for purpose and consistent with the National Electricity Objectives (NEO) so that our members can continue to provide a fit for purpose product for their customers.

Thank you for the opportunity to make a submission under the AEMO Security Enablement Procedures Consultation Paper.

At the EUAA, we support the design of rules, legislation and procedures that achieve efficient, cost effective and equitable outcomes for networks, developers and consumers. In the energy sector under most circumstances, this is best achieved through a national approach and a sharp focus on the NEO. From our perspective, this has not been achieved for the proposed approach to assets with multiple units in commercial operation.

AEMO'S APPROACH TO ASSETS WITH MULTIPLE UNITS IN COMMERCIAL OPERATION

EUAA supports in-principle AEMO's proposed revisions to how multi-unit dispatchable plant is classified as being in commercial operation.

Under the proposed arrangements however, generators must cap their maximum bid availability at minimum safe operating level (MSOL) to remain eligible for enablement payments, even where AEMO has issued a dispatch instruction requiring the unit to operate only at its MSOL for security reasons. This approach relies on bid maximum availability as a proxy for commercial intent, rather than the actual dispatch outcome.

This behaviour suppresses capacity that is already online and capable of responding in the market, which in turn causes AEMO's pre-dispatch projected assessment of system adequacy (PD PASA) to underestimate real system adequacy. The result is the potential for (avoidable) interventions including Lack of Reserve (LOR) notices, Reliability and Emergency Reserve Trader (RERT) activation and higher spot price volatility.

From market efficiency and therefore flow on consumer cost perspectives, EUAA considers that the AEMO should consider a generating unit is in commercial operation based on whether AEMO issues a dispatch instruction requiring operation above MSOL, rather than on the generator's offered bid maximum availability.

We support Shell Energy's submission and for further technical details, and details on utilising bid bands to assess commercial operation versus eligibility for essential system services enablement payments.

Importantly, we believe that this change can be implemented with minimal system updates while delivering material improvements in market efficiency and reducing the operational burden on AEMO.

CONCLUDING REMARKS

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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Chief Executive Officer