SUBMISSION

AEMO: CONGESTION INFORMATION RESOURCE UPDATE

29 OCTOBER 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, cement, paper, data services, 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 *Congestion Information Resource (CIR) Update* consultation.

The CIR plays an increasingly important role in enabling market participants to understand, anticipate and manage the operational and financial consequences of transmission network outages.

From the perspective of large energy users, transmission outages are not simply a network operational matter. They can materially affect production planning, maintenance scheduling, energy procurement strategies and risk management activities.

Many large industrial customers could schedule maintenance shutdowns around periods of expected network constraint or reduced generation availability, however this is impossible using the current CIR as outages are often moved, rescheduled or cancelled without explanation and with short lead times.

Equally, an increasing number of large energy users have entered into power purchase agreements (PPAs) with renewable generators. Transmission outages can significantly reduce or eliminate access to contracted generation output, exposing customers to wholesale market costs and basis risk that may not have been anticipated when contracting.

Timely and transparent information regarding planned outages therefore enables large consumers to make informed operational decisions, optimise maintenance activities, manage procurement risks and undertake appropriate hedging strategies. In this context, outage transparency is not merely an operational improvement, it delivers tangible market efficiency benefits by allowing participants to anticipate and manage network-driven risks.

EUAA supports AEMO's ongoing efforts to improve outage visibility through the Network Outage Scheduler (NOS), including the introduction of a four-month notification requirement for high impact outages and enhanced outage

status reporting. However, further improvements are warranted to ensure outage information provides sufficient transparency, accountability and predictability for all market participants.

In particular, EUAA supports many of the recommendations outlined in the submission provided by the Clean Energy Council, including enhanced visibility of outage changes, improved tracking of outage status, greater transparency of outage management decisions and stronger stakeholder engagement. These measures would materially improve the ability of large energy users to understand the causes, consequences and likely duration of network outages.

RESPONSE TO QUESTION 1

Are there other "Resubmit" or "Withdraw" outage reasons that should be considered?
EUAA supports the proposed categories identified by AEMO but considers that the usefulness of these categories will depend heavily on the level of supporting information that accompanies them. Generic categories such as "resource problems", "information update" or "optimising availability" provide limited value if participants cannot understand the underlying drivers.

Large energy users are increasingly relying on outage schedules to make significant operational and commercial decisions. When outages are resubmitted, deferred or withdrawn, participants need sufficient information to understand whether the change reflects an unforeseen event or deficiencies in outage planning and coordination.

The NOS should require supporting explanatory information to accompany every withdrawal or resubmission. This should be facilitated through mandatory free-text fields and, where appropriate, additional sub-categories that provide greater specificity regarding the underlying cause.

EUAA supports the creation of an "Other" category with mandatory explanatory text to ensure all outage changes can be adequately classified and understood.

In addition, consideration should be given to introducing several further categories including:

- Market conditions or pricing risk management.
- Customer supply reliability requirements.
- Construction or commissioning delays associated with third-party projects.
- Regulatory or environmental approval issues.
- Asset condition discoveries arising during outage preparation or execution.

Importantly, outage change classifications should be designed not only to inform market participants but also to support ongoing performance monitoring and regulatory oversight. Market participants should be able to understand trends in outage planning quality, outage deferrals and outage coordination outcomes over time.

EUAA also supports the development of guidance outlining when each category should be used and the minimum information requirements associated with each reason. This would improve consistency across transmission businesses and improve the overall quality of information available to the market.

RESPONSE TO QUESTION 2

Are there other improvements or considerations to include in the NOS system or NOS statistics publications?

EUAA strongly supports further enhancements to outage transparency and considers several additional improvements would materially improve market outcomes.

1. **Outage identification and traceability**

Each outage should have a permanent, unique identifier that remains unchanged throughout its lifecycle. Market participants should be able to readily track when an outage was first submitted, subsequently resubmitted, withdrawn, recalled, suspended or completed. This would provide a clear audit trail and improve understanding of outage planning and management performance. This proposal aligns with feedback already identified by AEMO.

2. **Temporary suspension functionality**

EUAA supports the introduction of a "temporary suspension" status within the NOS. Transmission outages are sometimes interrupted to respond to changing system conditions. Currently, market participants may observe an outage disappear and subsequently reappear without a clear understanding of what occurred. A temporary suspension status would improve transparency while preserving continuity of outage tracking through a single outage identifier.

3. **Public visibility of High Impact Outages**

EUAA supports publication of High Impact Outage (HIO) flags directly within the public NOS interface rather than relying solely on periodic reporting. High impact outages often have material implications for generation availability, congestion patterns and wholesale electricity prices. More timely visibility would assist large consumers in managing procurement, production and maintenance decisions.

4. **Improved outage impact information**

Market participants would benefit from greater visibility of expected outage impacts, including:

- likely constrained network elements;
- expected congestion impacts;
- expected effects on major renewable energy zones;
- interaction with significant generation projects; and
- expected duration and recall arrangements.

This information is increasingly important for large consumers holding renewable PPAs. Where transmission outages materially restrict renewable generation output, customers can face increased spot market exposure and hedging costs. Earlier visibility of these risks improves commercial decision-making and facilitates more efficient market responses.

5. **Recall and outage management reporting**

EUAA supports improved reporting of outages that are recalled, withdrawn, suspended or modified following discussions between AEMO and TNSPs. Market participants should be able to understand not only the final outage schedule but also why changes occurred and how system security considerations influenced those decisions. Formal recording and publication of these events would improve confidence in outage management processes.

6. **Historical outage database**

EUAA supports the creation of more accessible historical outage information. Historical data is valuable for understanding outage performance trends, assessing outage planning effectiveness and informing future investment and procurement decisions. Improved access to historical outage records would assist both market participants and regulators.

7. **Improved network information**

The proposed publication of network limits by region is also supported and should be progressed as a priority. Greater visibility of network capability and transmission constraints will assist large consumers in understanding evolving congestion risks and making better-informed investment and contracting decisions.

8. **Ongoing stakeholder engagement**

EUAA supports the establishment of a standing technical working group focused on outage transparency and outage management processes. Given the increasing significance of transmission outages across the NEM, engagement limited to periodic CIR reviews is insufficient. Regular engagement would provide a practical avenue for identifying emerging issues and continuously improving transparency arrangements.

CONCLUDING REMARKS

EUAA supports AEMO's ongoing work to improve outage transparency and congestion information. However, as transmission outages increasingly affect market outcomes, renewable energy access and customer risk exposure, there is a strong case for additional improvements to outage visibility, traceability and stakeholder engagement.

Large energy users require timely, accurate and actionable information to manage operational, commercial and financial risks. Improved outage transparency will enable consumers to better coordinate site maintenance activities, manage wholesale market exposures, understand risks to contracted renewable energy supply and make more efficient operational decisions.

The recommendations outlined above would improve market transparency, strengthen accountability for outage planning outcomes and enhance the ability of all market participants to respond efficiently to changing network conditions. EUAA therefore encourages AEMO to continue expanding the functionality and transparency of the CIR and Network Outage Scheduler in accordance with these principles.

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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