



**AGL Energy Limited**

T 02 9921 2999

[agl.com.au](http://agl.com.au)

ABN: 74 115 061 375

Level 24, 200 George St

Sydney NSW 2000

Locked Bag 14120 MCMC

Melbourne VIC 8001

[STPASAreplacement@aemo.com.au](mailto:STPASAreplacement@aemo.com.au)

Australian Energy Market Operator

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### **ST PASA Generator recall process consultation**

AGL Energy (AGL) welcomes the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) ST PASA Generator recall process consultation.

#### **About AGL**

Proudly Australian for more than 186 years, AGL supplies around 4.3 million energy and telecommunications customer services. AGL is committed to providing our customers simple, fair, and accessible essential services as they decarbonise and electrify the way they live, work, and move.

AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market (NEM), comprising coal and gas-fired generation, renewable energy sources such as wind, hydro and solar, batteries and other firming technology, and gas production and storage assets. We are building on our history as one of Australia's leading private investors in renewable energy to now lead the business of transition to a lower emissions, affordable and smart energy future in line with the goals of our Climate Transition Action Plan.

#### **Submission of recall times**

AGL is strongly opposed to the new proposed approach for the submission of recall times as we consider it would be extremely onerous for traders and site operations, with little additional benefit. We consider the current process whereby information is provided under existing ST PASA bids, with extra information either provided upon AEMO request or by generators if there is a change to the return to service time for a unit, has proven to be effective and does not need to be changed.

The new proposed approach would require constant communications between the trading desk and unit operations which would be highly time consuming and costly, and potentially even more challenging for battery energy storage systems.

We therefore request that AEMO not proceed with the proposed change to the generator recall process.

If you have any queries about this submission, please contact me at [aking6@agl.com.au](mailto:aking6@agl.com.au).

Yours sincerely,

Anton King

Senior Manager (ag)

Wholesale Markets Regulation