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Australian Energy Market Operator

Submitted online at: marketreform@aemo.com.au

To Whom It May Concern

**Stanwell submission:
Australian Energy Market Operator's Draft Market Visibility Framework
for price responsive resources, consultation paper**

Stanwell Corporation Limited (Stanwell) welcomes the opportunity to provide feedback on the Australian Energy Market Operator's (AEMO) *Draft Market Visibility Framework for price-responsive resources, consultation paper* (Consultation Paper).

Stanwell is Queensland's leading provider of electricity and energy solutions to the National Electricity Market and to large energy users along Australia's eastern seaboard.

With more than 40 years of continuous operations, Stanwell continues to provide reliable electricity from two of Australia's most efficient coal-fired power stations: Tarong Power Station near Kingaroy and Stanwell Power Station near Rockhampton.

Stanwell's experience in working with communities to develop, operate and maintain reliable coal-fired generation is also being applied, through partnerships with the private sector, to develop the new energy, storage and firming solutions Queensland will require in the future.

Although implementation of a Mandatory Visibility Framework was recommended by the NEM Review, this submission is directed to the design and implementation of the technical framework and its implications for forecasting, trading, retail and market operations. The comments in this submission should not be interpreted as endorsement of the broader recommendations of the NEM Wholesale Market Settings Review.

This submission reflects Stanwell's views only and should not be construed as representing the views or policy position of the Queensland Government.

Introduction

Stanwell recognises the growing influence of batteries, virtual power plants (VPPs), flexible loads, electric vehicles and other distributed energy resources on National Electricity Market outcomes. As these resources continue to expand, improved visibility may support more accurate forecasting, better operational decision-making and more efficient market outcomes. Stanwell supports the objective of improved transparency where it can be achieved through a proportionate, practical and evidence-based framework.

Visibility thresholds should reflect actual market impact

Stanwell continues to support a proportionate framework that links visibility and participation obligations to the materiality of a resource's effect on market outcomes.

Consistent with Stanwell's previous feedback to the NEM Review and the IPRR reforms, aggregated price-responsive resources should become visible at 100 kW, while mandatory participation obligations should

commence at 1 MW.^{1 2} Stanwell has proposed a 1 MW threshold for mandatory participation because a 1 MW increment can influence spot price outcomes. These thresholds would appropriately balance improved transparency against the need to avoid unnecessary compliance costs for smaller participants.

Threshold settings should encourage investment, aggregation and orchestration decisions that support operational efficiency, rather than decisions driven primarily by avoidance of market obligations. Resources capable of materially influencing market outcomes should be subject to appropriate visibility and participation requirements.

The expansion of the Small-scale Renewable Energy Scheme (SRES) to include solar PV systems between 100 kW and 1 MW³ is likely to increase the volume of distributed generation that can materially influence demand forecasts and market outcomes, while remaining largely outside existing visibility arrangements. Although SRES and DER registration processes provide information on installed capacity and location, they do not provide the operational or behavioural data required for robust forecasting.

The Market Visibility Framework provides an opportunity to improve visibility of these resources through Mode 1 (Observational Visibility), by leveraging existing datasets to improve forecasting and understanding of aggregate solar behaviour, and through Mode 2 (Predictive Visibility), where resources are coordinated, aggregated or price responsive and can provide forward-looking information to improve forecasting outcomes. This approach would enable AEMO to better forecast the growing contribution of distributed energy resources, while reserving more onerous operational and participation requirements for resources whose scale and behaviour materially influence system and market outcomes.

Obligations should sit with the party controlling the resource

Stanwell considers that visibility and participation obligations should sit with the entity coordinating and controlling the resource response, such as an aggregator or Voluntary Scheduled Resource Provider (VSRP). These entities should have operational oversight of the aggregated portfolio and are therefore best placed to provide forecasting, telemetry and other information required to support market operation and system security.

However, where a large customer directly controls and optimises its own price-responsive behaviour without an intermediary, consideration should be given to assigning obligations to that customer, particularly where its actions are material to market outcomes. The party making the operational decision and receiving the benefit of participation should, where practicable, bear the associated compliance obligations and costs.

Retailers must retain visibility of large customer participation

Retailer visibility remains an important element of the broader market design.

The Flexible Trading Arrangements (FTA) rule will enable large customers with consumer energy resources (CER) to participate in price-responsive frameworks through a secondary Financially Responsible Market Participant (FRMP). Because these arrangements may allow a large customer to operate independently of its primary FRMP, being the retailer, it is essential that the primary FRMP retain visibility of any CER participation through secondary metering.

It is also essential that obligations and penalties associated with participation by a secondary FRMP for a large customer be allocated directly to the party controlling the resource.

New information requirements should provide a demonstrable net benefit

Increased visibility of batteries, VPPs and other price-responsive resources should improve understanding of residual demand, price formation and intra-day market behaviour.

Before imposing more onerous obligations, AEMO should demonstrate how additional data will improve operational outcomes and forecasting performance. AEMO should first assess whether greater value can

¹ Stanwell Corporation submission, Expert Panel's: *Consultation on the National Electricity Market Wholesale Market Settings (NEM Review)*, 12 September 2025, page 4

² Stanwell Corporation submission, AEMC Consultation Paper: *Integrating price-responsiveness resources in the NEM* September 2023, page 2

³ *Renewable Energy (Electricity) Amendment (Mid-scale Solar) Regulations 2026 (Cth)* (F2026L01232), made 16 September 2026

be extracted from information already available through existing systems and reporting arrangements, thereby avoiding unnecessary duplication and limiting compliance costs for participants.

Implementation must be staged and coordinated

Stanwell supports a staged and evidence-based implementation pathway.

Stanwell supports AEMO's proposal to progressively increase visibility obligations over time. Review points should be incorporated throughout the implementation pathway so that implementation impacts are properly understood. Progression to the next visibility mode should occur only once the benefits of each preceding mode have been substantially realised. At this stage, Stanwell considers that the greatest benefits may be achieved immediately before full dispatch integration.

Conclusion

Improving visibility of price-responsive resources is beneficial where it delivers measurable improvements in forecasting accuracy, operational decision-making and market efficiency.

Stanwell considers that:

1. Consistent with its previous feedback to the NEM Review and IPRR reforms, visibility thresholds should reflect actual market impact, with visibility commencing at 100 kW and higher participation obligations commencing at 1 MW.
2. The expansion of the SRES to include 100 kW to 1 MW solar systems reinforces the need for proportionate visibility arrangements, with Mode 1 (Observational Visibility) supporting improved forecasting of distributed generation and Mode 2 (Predictive Visibility) applying where resources become coordinated, aggregated or price responsive.
3. Obligations should primarily sit with aggregators and VSRPs, with large customers bearing obligations where they directly control and benefit from material price-responsive behaviour.
4. Retailers should retain visibility of customer participation.
5. Visibility requirements should deliver demonstrable forecasting and operational benefits.
6. Implementation should be staged and coordinated with other AEMO reforms.

Stanwell looks forward to continuing engagement with AEMO as the framework develops and encourages a practical, proportionate and evidence-based approach that supports both consumer outcomes and efficient market operation.

If you have any questions in relation to this submission, please don't hesitate to contact Brad Supple at bradley.supple@stanwell.com.

Yours sincerely



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