

19 April 2024

NSW Independent Pricing and Regulatory Tribunal  
Level 16, 2 - 24 Rawson Place  
SYDNEY NSW 2000

Submitted electronically at: [essregulator@ipart.nsw.gov.au](mailto:essregulator@ipart.nsw.gov.au)

Dear Sir / Madam

**Consultation Paper: Operational changes to scheme participant compliance processes**

Stanwell Corporation Limited (Stanwell) welcomes the opportunity to respond to the NSW Independent Pricing and Regulatory Tribunal (IPART) 27 March 2024 Consultation Paper on Operational changes to scheme participant compliance processes.

As a major provider of electricity to Queensland, the National Electricity Market (NEM) and to large energy users including in New South Wales, Stanwell is invested in providing reliable and affordable energy for today and into the future.

To support State and Commonwealth Government emission reduction targets, and in recognition of the changes that will need to occur in the energy market to achieve these targets, we are currently developing renewable energy, storage, and hydrogen projects and technologies within Queensland to support the transition to more renewable energy and help to ensure Queensland electricity supply remains secure and reliable now and into the future.

Please note that this submission contains the views of Stanwell and should not be construed as being indicative or representative of Queensland Government policy.

Stanwell appreciates the opportunity to contribute to the consultation paper and is supportive of IPART's approach to implement learnings from the first Energy Savings Scheme (ESS) and Peak Demand Reduction Scheme (PDRS) combined compliance cycle. We support the operational improvements, specifically the provision of gross electricity market purchase data rather than net electricity purchase data. This will simplify reporting, reduce audit requirements, and allow for faster processing times while also removing the risk to participants of reporting incorrect information.

While Stanwell is supportive of the proposed changes in the Consultation Paper, we do believe there is scope to further simplify and improve the compliance timelines as described below.

The Scheme Compliance Guidelines prescribe that participants are to notify IPART of PDRS exemptions and certain liable acquisitions by the due date published in the scheme participant compliance timeline with a yes or no "notification". Under the Consultation Paper the proposed date is 31 May 2024 for the 2023-24 PDRS obligation.

Stanwell notes that the requirement to notify IPART of PDRS exemptions and liable acquisitions is not a requirement under the ESS, and as such asks IPART to consider amending this requirement. As an alternative, we propose that the "notification" be provided on the same date that participants submit their audited Individual Liable Demand in the Declaration of Liable Acquisitions (DLA) in The Energy Security Safeguard Application (TESSA). The due date for submission in TESSA on the scheme participant timeline for the 2023-24 PDRS is 15 November 2024. Aligning reporting timeframes in this way will reduce administrative burden on participants while simplifying the compliance process.

If you would like to discuss this submission further, please contact [REDACTED]  
[REDACTED]

Yours sincerely

[REDACTED]

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Energy Markets  
Stanwell