

12 July 2024

Mr. Daniel Westerman  
CEO, Australian Energy Market Operator  
Australian Energy Market Operator  
Lodged via email: [planning@aemo.com.au](mailto:planning@aemo.com.au)

Dear Mr Westerman,

### **Response to AEMO's report on Enhanced Locational Information**

The Clean Energy Investor Group (CEIG) welcomes the opportunity to provide feedback on the AEMO's report Enhanced Locational Information published in June 2024.

CEIG represents domestic and global renewable energy developers and investors, with more than 16GW of installed renewable energy capacity across more than 76 power stations and a combined portfolio value of around \$38 billion. CEIG members' project pipeline is estimated to be more than 46GW across Australia. CEIG strongly advocates for an efficient transition to a clean energy future on behalf of the investors who will provide the low-cost capital required for this transition.

#### **Key Points**

- CEIG recognises the **comprehensive and detailed** effort invested in the 2024 Enhanced Locational Information Report by AEMO.
- The report's **user-friendly format** and **valuable historical data** significantly aid in understanding past trends and developments within the National Electricity Market (NEM).
- CEIG welcomes the commitment by AEMO to **publish the ELI Report annually** including **seeking stakeholder feedback on each publication**.
- CEIG observe that **the report falls short in providing useful forecast data essential for strategic planning and investment decisions**.

**GENERAL COMMENTS**

CEIG recognises the comprehensive and detailed effort invested in the 2024 Enhanced Locational Information (ELI) Report by AEMO. The report's user-friendly format and valuable historical data significantly aid in understanding past trends and developments within the National Electricity Market (NEM). Furthermore, CEIG welcomes the commitment by AEMO to publish the ELI Report annually including seeking stakeholder feedback on each publication.

However, CEIG observe that the report falls short in providing useful forecast data essential for strategic planning and investment decisions.

**ENHANCED FORECASTING AND DATA TRANSPARENCY**

CEIG strongly advocate for an increased focus on forecasting headroom<sup>1</sup> at various network nodes. This forward-looking information is crucial for developers embarking on new projects and for investors making Final Investment Decisions (FIDs) on shovel-ready projects. Enhanced forecasting capabilities will enable more informed decision-making, leading to more efficient and effective investments in the renewable energy sector. The current report's lack of detailed forecast data limits stakeholders' ability to make strategic planning and investment decisions.

CEIG also emphasise the importance of enhanced data transparency and accessibility to enable all stakeholders to better understand the NEM's dynamics. Providing granular data forecast data on congestion, curtailment, and network capacity would be invaluable. Including forecasts for the integration of emerging technologies such as battery storage, hydrogen production, and electric vehicles is crucial. Understanding their potential impact on the grid and opportunities for renewable energy projects is essential for future planning. This new information will provide a much more granular and more regular understanding of current and future network availability which will support investors' siting decisions.

CEIG thanks the AEMO for the opportunity to provide feedback on its report and looks forward to continued engagement on those issues. Our Acting Policy Director can be contacted at [daniel.zelcer@ceig.org.au](mailto:daniel.zelcer@ceig.org.au) if you would like to further discuss any elements of this submission.

Yours sincerely,



Daniel Zelcer

Acting Policy Director

**Clean Energy Investor Group Ltd**

w: [www.ceig.org.au](http://www.ceig.org.au)

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<sup>1</sup> Headroom means the amount in MW that a generator at a particular node could increase before the tightest constraint begins to bind. Where a constraint is already binding headroom is zero.