

Market Visibility Framework for Price Responsive Resources — AEMO Consultation

Draft submission from Clean Energy Tasmania

October 2026

About Clean Energy Tasmania

Clean Energy Tasmania (CET) is an industry-led Board subcommittee of the Tasmanian Chamber of Commerce and Industry (TCCI). It brings together organisations with an interest in the responsible development of Tasmania's clean energy sector and its contribution to the state's economy.

CET's scope includes clean energy investment, generation, transmission, storage and supporting infrastructure. It provides industry perspectives and expertise to inform policy, advocacy and engagement with government and regulators.

This submission draws on member feedback, including input from West Coast Renew (WRE), which supports a proportionate approach to improving visibility of price-responsive resources.

CET's position

CET supports improved visibility of price-responsive resources where it leads to better forecasting, more efficient system operation and benefits for electricity consumers.

The ability to adjust electricity use, generation or storage in response to prices is valuable. The framework should preserve incentives to invest in this flexibility while addressing demonstrated gaps in the information available to AEMO.

CET supports AEMO's proposed staged approach, with requirements tested before mandatory obligations are introduced. Establishing the framework should not, by itself, trigger additional obligations for every resource.

This position is consistent with TCCI's policy principles supporting private investment, fair and predictable regulation, efficient administration and low business energy costs.

1. Target requirements to demonstrated market impacts

Requirements should reflect a resource's size, how its response is coordinated and its actual impact on forecasting and system operation.

CET supports the distinction between observational, predictive and operational visibility, and participation in dispatch. These should be applied according to demonstrated need. Resources should not automatically progress through increasingly demanding requirements.



Thresholds and assessment methods should be transparent and tested against regional conditions, including Tasmania's smaller market, generation mix and interconnection with Victoria. CET does not nominate specific thresholds at this stage.

Where additional information can adequately address an identified problem, more extensive dispatch obligations should require a separate justification.

2. Use existing information and avoid duplication

AEMO should first establish what can be achieved through existing data, reporting and forecasting arrangements.

Generators already participating in scheduled or semi-scheduled arrangements should not face duplicated requirements where the relevant information is already available. New obligations should address an identified information gap.

For resources involving retailers, aggregators, asset operators and customers, responsibility for providing information must be clear. Obligations should reflect who controls the response and who can reasonably obtain and provide accurate information.

Consistent data formats and reporting processes would help reduce costs and make participation more practical.

3. Demonstrate that benefits justify costs

CET supports testing information quality and usefulness before obligations are activated.

Each implementation stage should include a transparent assessment of the expected improvement in forecasting or system operation and the cost of obtaining it. This should cover costs incurred by AEMO and participants, including systems, metering, staff time and ongoing compliance.

The assessment should distinguish the effects of price-responsive behaviour from other causes of forecast error. It should also consider whether less costly changes to existing forecasting or reporting arrangements could achieve the required outcome.

CET recognises that benefits may be difficult to quantify precisely before trials occur. This strengthens the case for practical testing, published findings and clear decision criteria before proceeding.

Requirements should be reviewed after implementation to confirm they remain useful and proportionate.

4. Protect commercially sensitive information



Information about expected electricity use, operating schedules and responses to prices may reveal commercially sensitive aspects of a business.

The framework should clearly explain what information will be collected, who can access it, how it will be used and what will be published.

Public reporting should use aggregation or other protections where appropriate. This is particularly important in a smaller market, where individual businesses may be identifiable even when they are not named.

5. Preserve incentives for investment and flexibility

The framework should support continued investment in storage, demand response and flexible electricity use.

Forward-looking information will involve uncertainty. Requirements should distinguish a reasonable forecast of intended behaviour from a binding dispatch commitment and clearly explain how changes in operating conditions should be reported.

Compliance arrangements should recognise practical operating constraints and avoid making participation unnecessarily difficult for new entrants or smaller providers.

CET supports trials with affected operators and electricity users before detailed obligations are finalised. Participants should have sufficient notice and implementation time to make any necessary system or contractual changes.

6. Align with related reforms

The Market Visibility Framework should be coordinated with the proposed National Electricity Market regulatory reforms and Electricity Services Entry Mechanism.

Projects need consistent requirements and clarity about how visibility obligations affect eligibility for investment contracts. The same information should not have to be provided through multiple processes.

CET supports further consultation on implementation guidelines, including thresholds, reporting responsibilities, confidentiality and the evidence required to activate additional obligations.

The final framework should improve the information available for operating the electricity system while preserving the commercial value of flexibility and delivering demonstrable benefits to consumers.

