

13 May 2021

Ms Anna Collyer
Chair
Australian Energy Market Commission
Sydney South NSW 1235

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By online submission
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Dear Ms. Collyer

Prioritising arrangements for system security during market suspension

AEMO welcomes the opportunity to provide feedback to the AEMC's Draft Rule Determination on Prioritising Arrangements for System Security During Market Suspension published on 1 April 2021.

AEMO is supportive of the draft decision not to make the proposed rule change. We agree with the Commission that since the proposed rule was initiated as a result of the South Australian black system event on 28 September 2016, a number of the AER's recommendations made from its review of that event have been implemented, and therefore operational requirements in the NEM have now changed.

Additionally, AEMO agrees with the Commission that the solutions proposed in an attempt to further clarify the Rules may have instead created uncertainty or confusion in relation to the interpretation of the Rules and would have been more administratively onerous than complying with the current obligation. Our reasons for these views were outlined in detail in AEMO's submission to the AEMC's Consultation Paper¹.

Should you wish to discuss this submission further, please contact Kevin Ly, Group Manager Regulation on kevin.ly@aemo.com.au.

Yours sincerely



Tony Chappel
Chief External Affairs Officer

¹ AEMO submission to the AEMC's Consultation Paper on Prioritising arrangements for market suspension available at https://www.aemc.gov.au/sites/default/files/documents/rule_change_submission_-_erc0305_-_aemo_-_20210204.pdf