

17 December 2021

Ms Anna Collyer  
Chair  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Electronic Submission – ERC0304

## Draft Determination – Enhancing Operational Resilience in Relation to Indistinct Events

Dear Ms Collyer,

Energy Networks Australia (ENA) welcomes the opportunity to provide a response to the Australian Energy Market Commission's (AEMC) Draft Determination on the Enhancing Operational Resilience in Relation to Indistinct Events Rule change proposal.

ENA is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

ENA supports the Australian Energy Market Operator (AEMO) having the appropriate tools to manage power system risks in operational timeframes that stem from abnormal events. To strengthen the treatment of indistinct events in the National Electricity Market, ENA recommends that:

- the list of relevant stakeholders under clause 4.2.3B(d)(1) of the National Electricity Rules be expanded to include Distribution Network Service Providers. This reflects the expansion of the definition of a contingency event under clause 4.2.3(a) to include plant associated with electricity distribution;
- AEMO consider how it can improve transparency for the review of the reclassification criteria for all stakeholders, including those not directly involved in the targeted consultation process. This could include publication of AEMO's response to feedback received through the targeted consultation process and how it has considered this feedback in its review of the reclassification criteria; and
- clause 5.20A.1(a)(3) be updated to refer to "subparagraphs (1) to (2A)" to avoid a circular reference.

Should you have any queries on this response, please contact Verity Watson (vwatson@energynetworks.com.au).

Yours sincerely,



Andrew Dillon

**CEO**

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