

21 December 2021

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

Dear Ms Collyer

RE Draft Determination – Enhancing Operational Resilience in Relation to Indistinct Events (ERC0304)

TasNetworks welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) Draft Determination "Operational Resilience in Relation to Indistinct Events".

TasNetworks, as the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and the proponent for Marinus Link, is focussed on delivering safe, secure and reliable electricity network services to its customers at the lowest sustainable prices. As such, TasNetworks is supportive of providing the Australian Energy Market Operator (**AEMO**) appropriate tools to manage in operational timeframes power system risks that arise from hard to pre-define events.

TasNetworks' supports Energy Networks Australia's (ENA) submission and would like to make some additional comments.

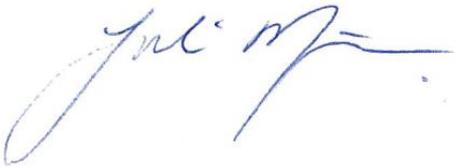
It is important for the reliable supply of power that AEMO can respond to any event that may potentially impact on the safe delivery of power to customers. The ability to reclassify an event as credible is crucial to ensure this. It is equally important that all stakeholders understand the reasons behind AEMO's decision to reclassify. Stakeholders should be provided the opportunity to understand the issues AEMO foresaw and the ability to put forward proposals for how the situation could managed alternatively in the future. AEMO should also be required to detail how it considered any feedback when amending the reclassification criteria. This is important to maintain the credibility of the reclassification process and to ensure it is only used when AEMO has no alternative. The proposed framework should ensure the impact of a future reclassification arising from similar abnormal events be reduced as far as possible as a result of market participants being able to respond through investment or information provision.

The current rules require AEMO to consult on the reclassification criteria with a targeted set of stakeholders. The DNSP part of TasNetworks benefits from the fact it is part of a combined TNSP and DNSP as only TNSPs are currently part of the targeted stakeholders. TasNetworks would see this indicates that including DNSPs in the consultation would be beneficial.

TasNetworks is encouraged by the AEMC's intention to ensure TNSPs are not exposed to any requirements in the planning horizon to manage the impact of indistinct events. Should this be changed in the final determination, TasNetworks requests the ability for TNSPs to recover the revenue required to manage these obligations be explicitly provided in the rules.

For more information or to discuss this submission, please contact Tim Astley, Network Reform and Regulatory Compliance Team Leader, at Tim.Astley@tasnetworks.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Julie Morrison', with a long horizontal flourish extending to the right.

Julie Morrison

Acting Leader Regulation