

26th May 2022



Andrew Pirie
Project Leader
Australian Energy Market Commission

Submitted electronically

Dear Andrew

National Electricity Amendment - Recovering the Costs of AEMO's Participant Fees

PIAC welcomes the opportunity to respond to the Consultation Paper on the proposed amendment to recovering the costs of AEMO's participant fees.

PIAC supports the submission made by the Energy Users Association of Australia (EUAA) and agrees the proposed rule change does not support the long-term interests of consumers because it does not promote the efficient operation of the energy system.

The proposed rule change would enable AEMO's costs to be passed directly through to consumers without any substantial review for efficiency. It is not in the long-term interests of consumers for any costs borne by consumers to be passed through without being subject to robust, transparent efficiency tests.

PIAC agrees with the EUAA that the treatment of National transmission planning (NTP) fees should not be used as a precedent for allowing the proposed change. PIAC supports their recommendation that NTP fees should be subject to a robust and transparent efficiency assessment.

The ongoing transition of the energy system is likely to involve a step-change in costs related to transmission. Consumers must be sure that all aspects of these costs, including those incurred by AEMO through its transmission planning and operational functions, are efficient.

PIAC would welcome the opportunity to discuss these matters further with the Commission and other stakeholders.

Yours sincerely

Douglas McCloskey
Program Director, Energy & Water

+61 2 8898 6534
dmccloskey@piac.asn.au