

1 August 2024

Ms Anna Collyer
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

By electronic submission

Dear Ms Collyer,

Minor Changes 2 2024 (ERC0398)

AEMO appreciates the opportunity to provide feedback on the proposed minor changes to the National Electricity Rules (NER), the National Gas Rules (NGR) and the National Energy Retail Rules (NERR) as initiated by the AEMC.

Having reviewed the proposed NER, NGR and NERR changes, AEMO agrees that the identified amendments are non-controversial and will provide greater clarity and certainty for the operation of the NER, NGR and NERR. AEMO has identified a number of additional NER changes for the AEMC's consideration that are outlined in Attachment 1. Some further context follows in relation to some of these proposed changes.

The proposal to delete clause 3.8.3(i) is on the basis that clauses 2.2.7(i) through (l) were removed in the IESS rule changes that took effect on 3 June 2024. The only purpose of 3.8.3(i) was to provide a clarification in relation to the effect of those (now deleted) clauses in 2.2.7.

The proposed changes to clause 3.11.6 (Dispatch of network support and control ancillary services by AEMO), seek to streamline existing documentation and governance processes. By way of background, the National Electricity Amendment (Network Support and Control Ancillary Services) Rule 2011 No. 2, which came into effect on 5 April 2012 introduced a requirement for AEMO to produce guidelines for the dispatch of NSCAS in support of the NSCAS dispatch procedures¹ AEMO was already required to produce under clause 3.11.6. This rule change also moved the obligation to consult from the procedures over to the new guidelines. AEMO's view is that there is no reason the content for the guidelines cannot be included within the NSCAS dispatch procedures and the requirement to publish the guidelines removed if the requirement to consult is moved back onto the NSCAS dispatch procedures. Neither the guidelines nor the requirement to publish and consult on them interact with any other clauses in the National Electricity Rules outside clause 3.11.6. AEMO is therefore proposing that the requirement for the guidelines simply be removed, and obligations to consult instead be applied to the NSCAS dispatch procedures.

¹ SO_OP_3708 Non-market Ancillary Services

Consolidation errors

AEMO is aware that there have been instances where the consolidated NER (currently version 214) have not fully reflected final rules as made, such as for the two IESS rule changes and the clarifying mandatory primary frequency response obligations for bidirectional plant rule change. The frequency, complexity and inter-related nature of rule changes understandably introduces risk that final rules are inadvertently not consolidated in full. AEMO appreciates the AEMC's recent efforts to address misalignment in the consolidated NER version, noting that this would otherwise have consequences for registered participants and AEMO alike. AEMO staff will seek a meeting with the AEMC to understand the AEMC's process to identify future misalignment between the final rules as made and the consolidated NER version.

If you have any questions regarding this proposed amendment please contact Paddy Costigan, Acting Group Manager – Reform Development & Insights on paddy.costigan@aemo.com.au.

Yours sincerely,



Violette Mouchaileh
Executive General Manager – Reform Delivery

Clause	Proposed NER Change
3.11.6(d)	Delete
3.11.6(e)	In clause 3.11.6(e) omit “paragraph (f)” and substitute “paragraph (a1)”
3.11.6(f)	In clause 3.11.6(f) omit “guidelines in paragraph (d)” and substitute “procedures in paragraph (a1)”
3.8.3(i)	Delete
5.3.9(a)(1)(ii)	In clause 5.3.9(a)(1)(ii) omit “ <i>adverse system strength impact</i> ” and substitute “ <i>general system strength impact</i> ”
5.3.7A(a)	In clause 5.3.7A(a) omit “ <i>Generation System</i> ” and substitute “ <i>Generating System</i> ”
5.3.7A(d)	In clause 5.3.7A(d) omit “ <i>Connection Application</i> ” and substitute “ <i>Connection Applicant</i> ”
5A.A.1 Definitions	In the definition of micro DER connection , omit “an a distribution connected unit” and substitute “a distribution connected unit”
8.13	In clause 8.13 omit “ <i>micro embedded generator</i> ” and substitute “micro embedded generator”
8.13	In clause 8.13 omit “ <i>non-registered embedded generator</i> ” and substitute “non-registered embedded generator”
Chapter 10 - Glossary	In the definition of basic micro EG connection service , omit “ basic micro EG connection service ” and omit “Has (in the context of Chapter 5A) the meaning given in clause 5A.A.1.”
11.135.2	In clause 11.135.2 omit “ <i>basic micro EG connection service</i> ” and substitute “basic micro EG connection service”
11.135.3	In clause 11.135.3 omit “ <i>basic micro EG connection service</i> ” and substitute “basic micro EG connection service”