

Australian Energy Market Commission

CONSULTATION PAPER

National Electricity Amendment (AER Authorisation of Software Changes by AEMO) Rule 2013

24 October 2013

For and on behalf of the Australian Energy Market Commission

**RULE
CHANGE**

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Reference: ERC0151

Citation

AEMC 2013, AER Authorisation of Software Changes by AEMO, Consultation Paper, 24 October 2013, Sydney

About the AEMC

The Council of Australian Governments (COAG), through its then Ministerial Council on Energy (MCE), established the Australian Energy Market Commission (AEMC) in July 2005. In June 2011, COAG established the Standing Council on Energy and Resources (SCER) to replace the MCE. The AEMC has two main functions. We make and amend the national electricity, gas and energy retail rules, and we conduct independent reviews of the energy markets for the SCER.

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1 Introduction

On 20 July 2012, the Australian Energy Regulator (AER) submitted a rule change request to the Australian Energy Market Commission (AEMC or Commission) which sought to remove from the National Electricity Rules (NER) the requirement for the AER to authorise the Australian Energy Market Operator (AEMO)'s software changes. The AER proposed that a new requirement be inserted in its place under which AEMO would be required to make software changes in accordance with its IT Change Management Procedures Manual (Manual).¹

This consultation paper has been prepared to facilitate public consultation on the rule change proposal and to assist stakeholders in making a submission on the rule change request.

This paper:

- sets out a summary of, and a background to, the rule change request proposed by the AER;
- identifies a number of questions and issues in relation to this rule change request; and
- outlines the process for making submissions.

The AER considers the proposed rule change request to be non-controversial and has requested that the proposal be subject to the expedited rule making process under s.96 of the National Electricity Law (NEL).

Submissions

Stakeholders have two weeks from the publication of the notice under s.95 of the NEL to submit written objections to the request for an expedited rule. Stakeholders have four weeks from the publication of the notice under s.95 of the NEL to provide written submissions on the content of the request. Additional information on the expedited process and due dates for submissions and objections are contained in Chapter 6 of this consultation paper.

Timetable

If the project proceeds on the expedited basis, it is intended that the final rule determination (and final rule, if applicable) will be published on 5 December 2013.

¹ This document describes AEMO's IT change management process that applies to all changes to the IT environment for market systems, real time systems and office systems. It is available on AEMO's website. See www.aemo.com.au for more information.

2 Background

Under clause 3.17.1 of the NER, AEMO is required to obtain authorisation from the AER for any changes to computer software required for the operation of the NEM. This requirement appears to have originated from the National Electricity Code (Code). Since the commencement of the NEM, under the Code, NEMMCO (National Electricity Market Management Company) (now AEMO) was prohibited from making any changes to software programs without authorisation from the National Electricity Code Administrator (NECA).

In 1999, NECA, in its interpretation of the obligation, implemented a method of automatically approving NEMMCO's software changes. Specifically, software changes would be deemed to be approved provided they met certain conditions. These conditions can be summarised as follows:

- the proposed change must have been subject to the change management procedures set out in the NEM system IT procedures manual, in particular the consultation requirement;
- that if six or more registered participants gave notice objecting to a proposed change, then the proposed change would be withdrawn;
- where a proposed change was withdrawn by NEMMCO in the circumstances above, either the participants' objections had to be resolved and the change resubmitted through the change management procedure or NEMMCO must put forward a specific application for authorisation of the proposed change from NECA. In this case, NECA would consult all registered participants before deciding whether or not to authorise the change.²

In 2005, the AER assumed NECA's responsibilities for authorising NEMMCO's software changes³ and continued to interpret the rule in the same manner for authorising AEMO's software changes as NECA had established with NEMMCO. AEMO has gradually developed its IT Change Management Procedures Manual which currently contains a set of conditions in section 4 by which software changes are authorised by the AER. More information about these conditions is contained in section 3.2 of this paper.

The AER reviewed its obligations under clause 3.17.1 and reached the view that authorising each of AEMO's software amendments would be of little additional value, given the processes established in AEMO's IT Change Management Procedures Manual.

² See the '*Approval of market software changes*' section of the NECA website: www.neca.com.au.

³ AER rule change request, 20 July 2012, p.3.

3 Details of the rule change request

3.1 Proposed changes and rationale

The rule change request from the AER contained two parts. It proposes to:

- remove the obligation on the AER to authorise software changes made by AEMO; and
- impose an obligation on AEMO to make software changes in accordance with its IT Change Management Procedures Manual.

In its rule change request, the AER provides a rationale for the rule change, which can be summarised as follows:

- The AER has recently reviewed the process by which it meets its obligations under clause 3.17.1 of the NER and reached the view that, given the processes established through AEMO's IT Change Management Procedures Manual, the AER's consideration of each individual software amendment would add very little value to the change management process.⁴
- The proposed rule change, if implemented, would codify the current practice and require AEMO to maintain its IT change management procedure, which would continue to develop in consultation with registered participants.⁵
- The proposed rule change, if implemented, would create efficiencies by removing the AER from a process it has not actively participated in for several years.⁶

The AER's rule change request includes a proposed rule and is accompanied by a letter of support by AEMO.

3.2 AEMO's IT Change Management Procedures Manual

As noted above, the effect of the proposed rule would be to rely on AEMO's compliance with its IT Change Management Procedures Manual. The Manual describes the change management process that applies to all changes made by AEMO to the IT environment for market systems, real time systems and office systems.⁷ Among other things, the Manual sets out the conditions under which software changes could be deemed to be automatically authorised by the AER.

⁴ AER rule change request, 20 July 2012, p. 3.

⁵ *ibid*, p. 4.

⁶ *ibid*.

⁷ AEMO, *IT Change Management Procedures Manual*, p. 6.

This approach follows the procedures that NEMMCO followed prior to the establishment of AEMO. Section 4 of the Manual outlines the AER's responsibility in relation to its authorisation of AEMO's software changes. Specifically, it states:⁸

“The AER does not propose to give specific authorisation to each change under the National Electricity Rules Clause 3.17.1 but rely on a general authorisation of any changes that require the AER's approval or otherwise would alter calculation methodologies or affect the content, format or timing of data made available to the Market subject to the following conditions...”

Further to this, section 4 of the Manual contains the following requirements for automatic authorisation by the AER:⁹

- The proposed change must have been subject to the change management procedures set out in the currently approved version of the AEMO IT Change Management Procedures Manual between AEMO and the Market Participants. In particular, all Market Participants must have been consulted about the proposed change in accordance with section 7.2.2 of the agreed procedures. Changes required under section 7.4.4 and which involve migration via Pre-Production are to be advised to the Market Participants and shall remain in Pre-Production for at least one month before it is promoted to productions (section 9 of the procedures); In cases where Market or National Electricity Rules requirements conflict with Participant requirements then the Market or National Electricity Rules requirements are to prevail on the understanding that Participants will be consulted and advised of the situation.
- If, within two weeks of notification to all market participants that a proposed change has been released to pre-production and where this timing does not conflict with the Market impact timing or National Electricity Rules requirements and 6 or more participants give notice to the AER that they object to the proposed change then the proposed change must be withdrawn.
- Where a proposed change is withdrawn by AEMO in the circumstances set out above, either participant's objections must be resolved and the change must be re-submitted through the agreed change management procedure or AEMO must put forward a specific application for authorisation of the proposed change by the AER. The AER will then consult all market participants, including the participants that initially object to the proposed change, before deciding whether or not to authorise it.”

⁸ AEMO, *IT Change Management Procedures Manual*, p. 16.

⁹ *ibid*, p.17.

The dispute arrangements

In the rule change request, the AER considers that the consultation arrangements outlined in the IT Change Management Procedures Manual provide a reasonable mechanism for registered participants to raise issues and concerns, and for AEMO to deal with disputes, related to specific software changes. Further, the AER considers that if there are objections to software changes which have not been resolved, registered participants would have recourse to the dispute resolution process set out in Chapter 8 of the NER.

Chapter 8 of the NER provides mechanisms for dispute resolution between registered participants, and between registered participants and AEMO. The process has two stages. The first stage requires participants to develop an internal or dispute management system (DMS) and appoint a DMS contact.¹⁰ This stage encourages participants to resolve their issues without involving a third party. The second stage provides the opportunity for the dispute to be decided upon by a dispute resolution panel or a process designed by an adviser or non-binding expert process if all parties agree.¹¹

The AER has created a flow chart to illustrate the time frame and overview of the dispute resolution process as outlined in Chapter 8 of the NER and it is available on the AER's website.¹²

3.3 How the AER and AEMO consider the rule will meet the NEO

The AER considers that the proposed rule change is consistent with the NEO, and, if made, would codify the current practice. It would also require AEMO to maintain its IT change management process which would continue to develop in consultation with registered participants before making any amendments. Further, the AER considers that the proposed rule would streamline the process to become more efficient for the benefit of all registered participants.¹³

In addition, in the supplementary material submitted by the AER in relation to this rule change request,¹⁴ the AER expressed the view that, if made the rule would improve the quality of the NER in terms of accuracy, by bringing the NER into line with the current practice. Consequently industry participants would be able to rely on the NER to a greater extent, which would promote the efficient operation of the market for the long term interests of consumers. The AER considers that the proposed rule would be likely to contribute to the achievement of the NEO, even though the efficiency benefits that would result from the proposed rule are considered to be small given the minor or immaterial nature of the changes proposed.

¹⁰ See NER clauses 8.2.2 and 8.2.3.

¹¹ See NER clauses 8.2.6A - 8.2.7.

¹² See Appendix A.

¹³ AER rule change request, 20 July 2012, p. 4.

¹⁴ AER rule change request supplementary information, 12 December 2012, p.2.

In its letter of support, AEMO considers that the proposed rule, if implemented, would increase the consistency in the way computer software modifications are treated in the NEM and other markets. While a minor benefit, AEMO also considers that the change may assist AEMO in simplifying operational practices across markets.¹⁵

3.4 The costs and benefits of the rule change as considered by the AER

The AER considers that, the rule if implemented, would incur on AEMO a one-off cost as part of consulting with registered participants on the IT Change Management Procedures Manual but that the cost would be minimal. Consequently, it may result in some minimal costs to market participants.

In addition, the AER considers that the proposed changes would serve to codify an existing practice, which would become more streamlined and benefit all market participants as a result.¹⁶

The AER further considers that the rule if implemented would not adversely affect AEMO or registered participants.

3.5 Consideration as a non-controversial rule change and the expedited process

The AER has requested that the rule change request be subject to the expedited rule making process under s.96 of the NEL on the grounds that it considers the rule change request as non-controversial. Section 87 of the NEL defines a 'non-controversial rule' as 'a rule that is unlikely to have a significant effect on the national electricity market'. The AER considers that this rule change will not have a significant effect because there will be no practical changes to the operation of the market, in that the proposed changes would essentially codify the current practice by which AEMO amends its software.

Further, the AER noted that the rule change should be considered as non-controversial given that:

- industry participants would still be permitted to raise objections to the proposed software amendments with AEMO; and
- the AER would continue the current reporting obligation under clause 8.7.2 of the NER, under which AEMO advises the AER of the outcomes of change management processes for software alterations.¹⁷

¹⁵ AEMO, Letter to the AER in relation to the AER authorisation of software changes by AEMO rule change request, 20 July 2012, p. 2.

¹⁶ AER rule change request, 20 July 2012, p. 4.

¹⁷ AER rule change request supplementary information, 12 December 2012, p.1.

Under an expedited process, the Commission has six weeks from the publication of the notice under s.95 of the NEL to publish a final rule determination. No draft rule determination is published.

3.6 Additional information on the rule change request

In assessing the AER's proposal, the AEMC posed several questions to the AER in order to obtain clarification on certain aspects of the rule change request. Making an initial assessment of the AER's proposal, the AEMC requested additional information, in particular, on why the AER was requesting that the rule change was 'non-controversial', and which aspects of the NEO the proposed rule would impact upon. The AER's response to these questions is published as supplementary material to the rule change request.

4 Assessment framework

The Commission's assessment of this rule change request must consider whether the proposed rule promotes the national electricity objective (NEO) as set out under s.7 of the NEL. The NEO states:

“The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to –

- (a) price, quality, safety, reliability and security of supply of electricity;
and
- (b) the reliability, safety and security of the national electricity system.”

In assessing the rule change proposal against the NEO, the Commission proposes to consider the likely long term impacts and benefits of adopting the proposed rule compared to the counterfactual of not making the proposed change to the NER. It also proposes to consider whether the proposed rule will, or is likely to, contribute to the achievement of the NEO.

In assessing how the proposed rule is likely to promote the efficient operation and use of electricity services, the Commission proposes to consider:

- the appropriate roles and responsibilities of the AER and AEMO as set out in the NEL; and
- the appropriate role for the IT Change Management Procedures Manual within the current energy market governance framework.

The appropriate allocation of roles and responsibilities, together with an appropriate process for making IT changes, can provide assurance that the IT changes that are made are appropriate. It is in this way that any change to the Rules will, or is likely to, contribute to the achievement of the NEO

Question: Assessment framework

- 1 Is the assessment framework proposed by the Commission appropriate? Please explain your view.**

5 Issues for consultation

A number of issues appear relevant to this rule change request. The issues outlined below are provided for guidance only. Stakeholders are encouraged to consider and comment on these issues as well as any other aspects of the rule change request or this paper, including the proposed assessment framework.

5.1 Removing the AER from the process

In its rule change proposal, the AER proposes to remove the requirement for it to authorise software changes made by AEMO. There are several issues associated with this aspect of the rule change request.

Since the commencement of the NEM, AEMO (then NEMMCO) has been prohibited from making any changes to the software required to operate the wholesale electricity market without authorisation from the AER (then NECA).¹⁸ The AEMC understands that NECA was given this responsibility primarily due to the inherent uncertainties associated with the start of market operation.

For this rule change request, it is important to understand the extent to which the obligation on the AER remains necessary in the current market environment. It is also important to consider whether the obligation is appropriate given the regulatory framework established by the NEL, in particular, the primary roles of the AER and AEMO.

In the 14 years this process has been in place, the AEMC understands that AEMO has successfully dealt with any issues raised by market participants without ever having to specifically request authorisation from the AER for a software change to which a participant has objected. Due to the manner in which AEMO and the AER have chosen to meet the current rule, the AER has no background in checking AEMO's software changes.

The NEL sets out the statutory roles and functions of the AER and AEMO.

The primary source of the AER's powers is outlined in the NEL, which places broad regulatory functions upon the AER and corresponding powers to carry out its functions. Under s.15(1)(a) of the NEL, the AER has functions and powers to monitor AEMO's compliance with the NEL, the NER, the National Electricity South Australia Regulations (Regulations) and transmission determinations. Accordingly, s.15 (1)(a)(iii) of the NEL does not give the AER a general power to monitor AEMO's software changes.

Clause 8.7.2 of the NER provides that the AER must establish a number of reporting requirements, and procedures and standards, applicable to certain market participants (including AEMO) in relation to certain matters relevant to the NER. Consistent with

¹⁸ National Electricity Rules, clause 3.17.1.

this provision, the AER currently requires AEMO to report on the outcomes of its change management processes for software alterations. The purpose of this is to keep the AER informed as to the changes that AEMO makes in this regard.

Under s.49 of the NEL, AEMO has a list of powers, obligations and functions, including:

- to operate and administer the wholesale exchange;
- to promote the development and improve the effectiveness of the operation and administration of the wholesale exchange;
- having regard to the NEO when carrying out its functions (s.49(3)); and
- the power to do all things necessary or convenient for or in connection with its statutory functions (s.49(A)).

The proposed deletion of cl.3.17.1 of the NER may be consistent with the regulatory framework outlined in the NEL and noted above. This is because:

- it removes the AER's oversight of AEMO's administration and operation of the wholesale exchange with respect to AEMO's software unless such changes are required by specific legislative obligations upon AEMO; and
- it removes the AER's oversight of upgrades, maintenance or enhancement of AEMO's software where such changes are legitimately made pursuant to AEMO's function of administering and operating the wholesale exchange and are not in breach of the NEL or NER.

Questions: Removing the AER from the process

- 2 Is it appropriate to remove the obligation on AEMO to seek authorisation from the AER for IT software changes?**
- 3 What are the risks (if any) associated with removing the AER from the process? Please explain your view.**

5.2 Requiring AEMO to make changes in accordance with the IT Change Management Procedures Manual

In addition to the removal of the AER from AEMO's software change process, the AER proposes that the NER be amended to include an explicit requirement for AEMO to make changes in accordance with its IT Change Management Procedures Manual. Issues associated with this aspect of the rule change request are considered below.

5.2.1 The primary purpose of the rule change

In its rule change proposal, the AER states that the proposed rule will create efficiencies by removing the AER from a process it has not actively participated in for several years.¹⁹

However, including a new rule requiring AEMO to comply with the IT Change Management Procedures Manual would, in effect, create a new process which the AER would be required to monitor. There is therefore a question as to whether the efficiency benefits the AER seeks to gain from removing itself from the process will be achieved in full given this new obligation.

5.2.2 The role of the IT manual within the current energy market governance framework

The AER has stated that, among other things, the rule change will require AEMO to follow and maintain a robust IT change management process developed in consultation with registered participants before making any amendments.²⁰

However, the proposed rule does not include details of the document. It does not specify what form the document should take, any required content, or any processes for amending the document and consulting with stakeholders.

Further, Chapter 3 of the NER currently sets out a statutory framework that gives AEMO broad discretion to establish procedures. It also establishes 'checks' on this power. For example, clause 3.2.1(b) requires AEMO to establish procedures for consultation and, under clause 3.2.1(c), to publish an annual performance indicator.

In terms of compliance, the AER is limited to confirming that AEMO's Manual exists, and not the quality of that document. The AEMC will have to consider whether the NER can obligate the Manual to have any degree of quality.

In assessing this rule change request, the AEMC will therefore consider whether it is necessary, given the existing governance framework as outlined above, to elevate the status of AEMO's IT Change Management Procedures Manual into the NER.

5.2.3 Process for making changes in the absence of AER authorisation

The AER indicates that, following the removal of the AER from the software approval process, changes to software would be progressed via the process outlined in AEMO's Manual. The proposed rule requires AEMO to follow and maintain an IT change management process, before making any amendments to the computer software required under Chapter 3 of the NER.²¹

¹⁹ AER rule change request, 20 July 2012, p. 4.

²⁰ *ibid.*

²¹ AER rule change request, 20 July 2012, p. 4.

However, the AEMC has had some difficulty understanding the software change process that is currently set out in the Manual. Following discussions with the AER and AEMO, it appears that there are some differences between what may occur in practice and the process that is outlined in AEMO's Manual.

While the content and quality of the Manual is not specified in the NER, in considering the rule change request, stakeholders may wish to consider whether the IT change management process prescribed in AEMO's Manual is up to date and fit for purpose, particularly if the AER was removed from the process.

5.2.4 Process for resolving disputes in the absence of AER authorisation

As noted in section 3.2, the AER has stated that, in the event that there is a dispute between AEMO and market participants in relation to a proposed software change, the dispute process referred to in the Manual, which is the process outlined in rule 8.2 of the NER, would be followed.²²

However, it is not clear that the dispute process as set out in the Manual is appropriate for this purpose. That is, whether the dispute resolution process set out in Chapter 8 of the NER is appropriate (or even applicable) for the resolution of disputes related to software changes. This is because, under section 120A of the NEL, there is a specific immunity under which AEMO and its officers, employees, or agents incur no civil monetary liability for loss or damage suffered by a registered participant or other person in consequence of the use of computer software to operate the NEM.

That said, the AER and AEMO have indicated that to date, all issues raised by market participants have been addressed without the need for formal dispute resolution.

The content of the Manual, including arrangements for addressing disputes between AEMO and market participants, is not specified in the NER. Nonetheless, in considering the rule change request, stakeholders may wish to consider whether the dispute process currently set out in the Manual is appropriate in the event the AER was removed from the process.

5.2.5 AEMO's obligations under Chapter 3 of the NER

The NER imposes obligations on AEMO with which it must comply. This includes the obligation on AEMO under clause 3.2.1 to operate and administer the market in accordance with Chapter 3 and all the other specific rules that require AEMO to perform its functions in a particular manner. If AEMO is in breach of the NER then the AER may take proceedings against AEMO in accordance with Part 6, Division 2 of the NEL. One of the AER's functions is to monitor compliance by AEMO with the NEL, Rules and Regulations made under the NEL.²³

²² *ibid*, p. 3.

²³ Section 15(1)(a)(iii) of the NEL.

The NER is generally not prescriptive on what resources or facilities AEMO must use in order to perform its functions. For example, the NER does not usually specify whether AEMO must carry out a particular function via a computer system or by a manual method. This practical detail is left to AEMO to determine as it is ultimately responsible for ensuring that it is compliant with the NER. This is appropriate given that, depending on the resources available and technological developments, AEMO may consider that it is more efficient to automate tasks that had previously been done manually or that certain functions are more appropriately carried out manually.

However, there are some specific rules that impose requirements and checks on how AEMO changes software, for example;

- Clause 3.8.21(l) requires AEMO to fully document the operation of the online dispatch process, including the software and algorithms, and make the documentation available to scheduled generators, semi-scheduled generators and market participants on certain conditions.
- Clause 3.13.10 requires AEMO to appoint a market auditor, at least annually, to review (among other things) AEMO's process for software management and its procedures and their compliance with the NER. AEMO is also required to publish reports from market auditors.

Given AEMO's statutory functions set out in the NEL and the obligations set out under Chapter 3 of the NER, AEMO has power to make any software changes necessary to operate the market, without the need to seek authorisation from the AER. However, while AEMO has a certain level of discretion in this regard, it must also operate within the boundaries set out in Chapter 3 of the NER.

In assessing this rule change request, it is relevant to consider whether the existing framework in Chapter 3 of the NER noted above provides a sufficient constraint on AEMO not to proceed with changes to its software where these changes may have a detrimental impact on the market.

Questions: Requiring AEMO to make changes in accordance with the IT Manual

- 4 Do you think it is necessary to elevate the IT Manual into the NER? Please explain your view.**
- 5 If the IT Manual were to be elevated to the NER, should the minimum requirements for the Manual be specified and if so, what should those minimum requirements be?**
- 6 To the extent that the primary purpose of the rule change is to remove the AER oversight of AEMO's software changes, what impact will the inclusion of a new obligation have in terms of efficiency?**

- 7 Is the dispute resolution process outlined in Chapter 8 of the NER appropriate in this regard? Please explain your view.**
- 8 If the rule is made as requested by the AER, should the NER specify a dispute resolution process, and if so, what should it be?**
- 9 Are the general requirements placed on AEMO in relation to operating the market sufficient to prevent inappropriate IT system changes being made?**

5.3 Additional considerations

As mentioned previously, the questions outlined are provided for guidance only. Stakeholders are encouraged to comment on these issues as well as any other aspect of the rule change request or this paper including the proposed framework. Some additional considerations are set out below.

Questions: General

- 10 Do you consider that the proposed rule will or is likely to better promote the NEO? Please explain your view.**
- 11 The AER considers that the proposed rule will not adversely impact AEMO or registered participants. Do you agree with this view?**
- 12 The AER considers that both the costs and benefits associated with this rule change are minimal. Do you agree with this view?**
- 13 Should the Commission consider any alternative approaches to the way in which AEMO makes software changes?**

6 Lodging a submission

The Commission has published a notice under s.95 of the NEL for this rule change proposal inviting written submissions. Submissions are to be lodged online or by mail by 21 November 2013 in accordance with the following requirements.

Where practicable, submissions should be prepared in accordance with the Commission's guidelines for making written submissions on rule change proposals.²⁴ The Commission publishes all submissions on its website subject to a claim of confidentiality.

Objections to the expedited rule making process are to be lodged in the same manner as submissions and are to be received by 7 November 2013.

All enquiries on this project should be addressed to Sophie Cazabon on (02) 8296 7800.

6.1 Lodging a submission electronically

Electronic submissions must be lodged online via the Commission's website, www.aemc.gov.au, using the "lodge a submission" function and selecting the project reference code "ERC0151". The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated.

Upon receipt of the electronic submission, the Commission will issue a confirmation email. If this confirmation email is not received within three business days, it is the responsibility of the person making the submission to ensure that it has been delivered successfully.

6.2 Lodging a submission by mail

The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated. The submission should be sent by mail to:

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Or by fax to (02) 8296 7899.

The envelope must be clearly marked with the project reference code: ERC0151.

Except in circumstances where the submission has been received electronically, upon receipt of the hard copy submission the Commission will issue a confirmation letter.

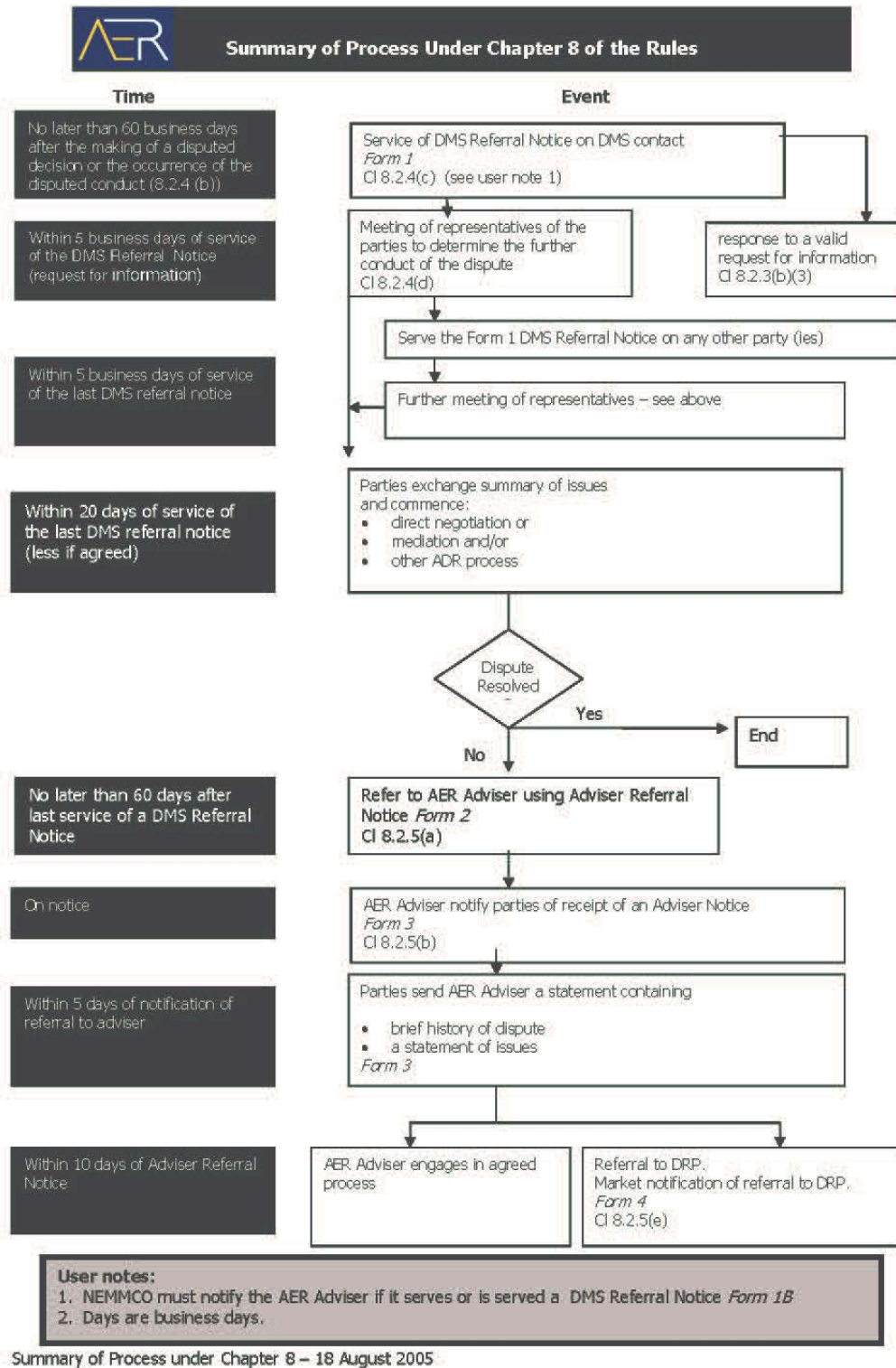
²⁴ This guideline is available on the Commission's website.

If this confirmation letter is not received within three business days, it is the responsibility of the person making the submission to ensure successful delivery has occurred.

Abbreviations

AEMC	Australian Energy Market Commission
AER	Australian Energy Regulator
AEMO	Australian Energy Market Operator
Commission	See AEMC
NECA	National Electricity Code Administrator
NEL	National Electricity Law
NEMMCO	National Electricity Market Management Company
NEO	National Electricity Objective
Regulations	National Electricity South Australia (Regulations)

A AER summary of the dispute resolution process



Source: AER, *Summary of Process under Chapter 8 of the Rules*, AER website (www.aer.gov.au).