

Sophie Cazabon
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

By online submission at www.aemc.gov.au

Friday 8 November, 2013

Dear Ms Cazabon,

AER Authorisation of Software Changes by AEMO: Reference ERC0151

GDF Suez Australian Energy (GDFSAE) appreciates the opportunity to respond to the AER proposal that their Rule change proposal regarding authorisation of software changes by AEMO be an expedited process.

GDFSAE do not agree with the proposal to conduct an expedited Rule change process for this proposal, as there are a number of questions that will need consideration, including:

- Implications of effectively elevating AEMO's IT Change Management Procedures Manual into the NER,
- The current quality of AEMO's IT Change Management Procedures Manual (AEMC have themselves highlighted some concerns about the clarity of the current procedure),
- Whether the chapter 8 dispute resolution process is applicable to a AEMO software procedure (if not – then what is?),
- Whether the current chapter 3 obligations on AEMO are sufficient to ensure that AEMO cannot impose detrimental software changes on the market,
- Whether we are content to rely on the assurances of the AER that they will continue to apply their current monitoring procedure relating to AEMO software changes, with no apparent rule obligation continuing

GDFSAE suggests that proper consideration of these issues, as well as other issues that might be identified, requires a full Rule change consultation process.

GDFSAE therefore requests that this Rule change *not* be expedited.

Please do not hesitate to contact me should you have any enquiries regarding this request.

Yours sincerely,



Chris Deague

Senior Market Specialist

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