

13 February 2020

Mr Ed Chan
Director
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235



Dear Mr Chan

Submission to Introduction of metering co-ordinator planned interruptions rule change draft determination

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC's) draft determination on the rule change proposal to introduce metering co-ordinator planned interruptions.

PIAC reiterates our significant concerns with the rule change as proposed, and supports the alternative draft determination. We agree with the AEMC that the existing framework provides scope to deal with the issues identified, and support the Commission's approach in clarifying the relative roles of Distributors and retailers and providing additional direction to aid more efficient communication, co-operation and information provision. The Draft Determination outlines a sensible and effective response that minimises regulatory complexity and maintains crucial consumer protections. PIAC strongly recommends that the Commission proceed with the rule as drafted.

Continued engagement

PIAC would welcome the opportunity to meet with AEMC and other stakeholders to discuss these issues in more depth.

Yours sincerely,

Douglas McCloskey

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