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Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted electronically

Contingency arrangements for five minute settlement implementation (ERC0331)

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to make a submission to the draft rule determination from the Australian Energy Market Commission (the Commission) on Contingency arrangements for five minute settlement implementation.

Red and Lumo strongly support the Australian Energy Market Operator (AEMO) issuing their market start notification for a go live date of 1 October 2021. In the lead up to the issuing of the market start, AEMO has made presentations to industry that the residual risks that remain are:

- Inaccurate commercial outcomes for Participants
- Operational inefficiencies for Participants
- Participant inability to consume/process 5 min data

The net result of AEMO's decisions made to date have, as identified above, resulted in the risks residing with participants, not AEMO. While Red and Lumo strongly support the go live occurring on 1 October 2021, we stress the importance of AEMO establishing and maintaining heightened support to participants post-go live for both 5 minute settlement and the other industry changes being implemented concurrently. We urge the Commission to ensure that it is satisfied that the risks on participants are minimised, as all residual risk of deployment rests on participant with this release.

About Red and Lumo

We are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in South Australia, Victoria, New South Wales, Queensland and the ACT to over 1 million customers.

Should you wish to discuss or have any further enquiries regarding this submission, please call Christophe Bechia, Regulatory Manager on 0414 183 880.

Yours sincerely

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