

Mr. Mick Keogh
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

c/o ACCC Submissions Webform

Dear Mr Keogh

Letter of Support: ACCC Authorisation to Australian Energy Market Operator Coordination

I write to respond to ACCC Draft Determination for Australian Energy Market Operator (AEMO) with respect to coordination and information sharing for the purpose of scheduling System Works in the National Electricity Market (NEM).

The proposed authorisation is valuable and necessary to obtain a coordinated view of maintenance activities and allow participants to share information in an open and timely manner.

The interim authorisation has coordinated information across market participants which would otherwise take longer to analyse and may not be disclosed in time to manage reliability risks. Mitigation measures are more effective when additional time is available to respond and explore available options. It is our view that enabling AEMO to coordinate information of System Works will reduce risks to electricity reliability and security in the NEM and deliver a public benefit.

The interim authorisation has required representation from each jurisdiction at meetings, in addition to an external lawyer with expertise in competition law, engaged by AEMO and approved by the ACCC to mitigate against anti-competitive behaviour.

Projected Assessment of System Adequacy is the principal method for forecasting the adequacy of the power system. This process is inadequate to obtain a comprehensive and timely view of potential system constraints and options to address them. The authorisation has captured detailed insights from operations and maintenance teams which are essential to effectively manage reliability risks and ensure system availability in the short and medium term.

Market participants have full visibility of forecast demand, available capacity, and reserve margins through Projected Assessment of System Adequacy. Market participants already use this information to adjust their bidding strategies. It is not clear how coordinating detailed information on maintenance activities risks lessening competition.

Should you require further information, please contact Zach McEvoy at zach.mcevoy@dpie.nsw.gov.au

Yours sincerely



Liam Ryan
Jurisdictional System Security Coordinator
Advising Executive Director
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