

13 August 2020



Australian Competition and Consumer Commission
Level 7, 175 Pitt Street
Sydney NSW 2000

Dear Commissioners,

Subject: Australian Energy Market Operator interim authorisation (AA1000484)

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 Competition and Consumer Commission's (the Commission) new interim authorisation granted to the Australian Energy Market Operator (AEMO) and others on 24 July 2020.

We support the intent of the proposed authorisation to allow AEMO and participating parties to engage in certain conduct intended to ensure the ongoing safety, security and reliability of Australian energy systems and the integrity of wholesale markets during the COVID-19 pandemic. As the crisis looks set to continue into 2021 we support the new authorisation remaining valid until March next year.

We support the Commission's reporting requirements for participating parties, particularly the requirement for a description of the issues arising from the COVID-19 pandemic that the proposed conduct seeks to address and how it will be addressed.

We consider the types of conduct the authorisation allows may result in cost savings for the participating businesses as they are better able to coordinate various resources. We propose if this is the case participating businesses should pass these cost reductions through so consumers may benefit.

Yours sincerely

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