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19 May 2022

Mr Edward Orum Project Leader Australian Energy Market Commission Level 15, 60 Castlereagh Street SYDNEY NSW 2000

Submitted online: https://www.aemc.gov.au/contact-us/lodge-submission

Dear Mr Orum,

## SUBMISSION ON IMPROVING CONSULTATION PROCEDURES IN THE RULES

Powerlink Queensland (Powerlink) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC's) Draft Determination on the Australian Energy Market Operator's (AEMO's) proposal to improve consultation procedures in the National Electricity Rules (the Rules).

Our earlier submission on the AEMC's Consultation Paper stressed the importance of the Rules Consultation Procedures being sufficiently flexible to enable the development and review of subordinate instruments made under the Rules. We support the AEMC's proposal in the Draft Determination to add new consultation processes for expedited, and for minor and administrative, changes to existing instruments. The new processes will enable decision-makers to tailor consultation according to the significance and complexity of proposals to amend instruments. The ability to switch from the expedited to the standard consultation procedure will further support fit-for-purpose consultation for existing instruments. In terms of the standard consultation procedure, we welcome the increased certainty of timeframes for stages of the process, coupled with the flexibility for decision-makers to extend timeframes if necessary, in the Draft Determination.

The Draft Determination supports our proposal that AEMO and the Australian Energy Regulator (AER) publish registers on their websites of the instruments they administer under the Rules. We agree with the AEMC that registers would increase transparency and reduce transaction costs for stakeholders, and we encourage AEMO and the AER to develop and publish their registers as soon as practicable.

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If you have any questions regarding this submission or would like to meet with Powerlink to discuss this matter further, please contact me on (07) 3860 2667 or by email at <a href="mailto:jenny.harris@powerlink.com.au">jenny.harris@powerlink.com.au</a>.

Yours sincerely,

Jennifer Harris

GENERAL MANAGER, NETWORK REGULATION