

3 October 2024

Ms. Genevieve Schulz  
Project Leader  
Australian Energy Markets Commission  
<https://www.aemc.gov.au/contact-us/lodge-submission>

Dear Genevieve,

**Shortening the settlement cycle (ERC0384)**

CitiPower, Powercor and United Energy (networks) welcome the opportunity to provide feedback on the Australian Energy Markets Commission (AEMC) draft determination Shortening the settlement cycle (draft rule).

The AEMC has proposed a more preferable draft rule to shorten the National Electricity Market (NEM) settlement cycle to 11 business days following the end of a billing period. We understand draft rule was informed by the 11 stakeholder submissions received in response to the consultation paper, as well as further supporting analysis from the Australian Energy Market Operator (AEMO).

The networks make no comment as to whether the draft rule better the National Electricity Objective however, we do wish to comment on the consequential system changes and commencement date for the draft rule.

AEMO have advised to ameliorate the implications for networks such as ours, and to ensure an orderly transition to the draft rule, 3 potential pathways to implementing the draft rule. On review of these pathways, presented in the High-level implementation assessment (HLIA), and AEMO's recommendations with respect to the pathways, we strongly support the AEMO recommendation the AEMC adopt pathway 3 when considering its final rule.

The draft rule proposes a commencement date of 26 April 2026. As identified in the HLIA, we do not believe this is a realistic commencement date and support a November 2026 commencement date for the final rule.

The energy transition is triggering many rule changes, often with overlapping and competing changes required to the IT systems of networks. In section 6.1 of the HLIA, AEMO recommends the AEMC align the final rule commencement date with its existing twice-yearly release schedule. We support this. Given the recent final rule Unlocking CER through flexible trading has scheduled release for May and November 2026, we do not support a third annual release at the end of June 2026

If you have any questions, please contact me on 0409 805 058, [bcleeve@powercor.com.au](mailto:bcleeve@powercor.com.au).

Sincerely,



Brent Cleeve  
**Head of Regulatory Policy & Compliance**  
**CitiPower, Powercor and United Energy**