

12 March 2026

Ms Anna Collyer  
Chair  
Australian Energy Market Commission  
Sydney South NSW 1235

By online submission: ERC0415

Dear Ms Collyer

**AEMO Response to AEMC Draft Rule Determination and Draft Rule for Enhancing access for registered participant representatives**

AEMO welcomes the opportunity to provide a submission on the Australian Energy Market Commission's (AEMC's) Draft Rule Determination and Draft Rule published on 5 February 2026.

AEMO appreciates the AEMC's consideration of the rule change request and considers that the draft rule broadly reflects the intent of the proposal. In particular, the proposed amendments clarify aspects of the confidential information framework while maintaining the existing policy settings under the National Electricity Rules (NER) and National Gas Rules (NGR).

**Operation of the confidential information framework**

AEMO notes the draft rule preserves the existing allocation of responsibility within the confidential information regimes under the NER and NGR. In particular, the responsibility for ensuring confidential information is disclosed only in accordance with the respective Rules continues to rest with the party making the disclosure.

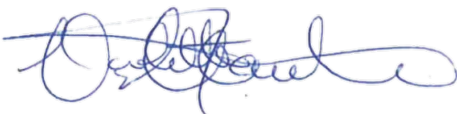
This means Registered Participants will remain responsible for ensuring that any person to whom they authorise access to confidential information falls within the categories of permitted disclosure under the Rules. Participants will therefore continue to bear responsibility for managing compliance with the confidential information provisions where information is accessed by individuals acting on their behalf.

**Implementation context**

This draft rule supports the implementation of improved identity and access management arrangements across AEMO's systems. These arrangements will enable registered participants to authorise and manage access to information in a more structured and auditable way, supporting improved governance and security of market information.

Should you wish to discuss any of the matters raised in this submission, please contact Hannah Heath, Group Manager – Strategic Market Reform, at [hannah.heath@aemo.com.au](mailto:hannah.heath@aemo.com.au).

Yours sincerely,



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**Executive General Manager, Policy and Corporate Affairs**