

25 May 2026

Australian Energy Market Commission
Submitted electronically

Re: Draft Determination - Clarifying the treatment of jurisdictional policies and system costs in the ISP

The Justice and Equity Centre (JEC) welcomes the opportunity to make a submission to the AEMC's Draft Determination - National Electricity Amendment (Clarifying the treatment of jurisdictional policies and system costs in the ISP) Rule, (Draft Determination).¹

The JEC supports the Commission's Draft Determination not to proceed with the rule change proposal.

There are issues with the consideration of jurisdictional schemes in the Integrated System Plan (ISP), and these issues warrant further reform attention. However, we do not support the problems as set out by the proponent, and do not support their proposed solution. We refer to our earlier submission to the consultation paper for more expansive reasoning, and why we support the decision not to proceed with the rule change proposal.²

Reforms to the National Electricity Rules setting out the purpose and process of the biennial ISP are required, including how jurisdictional schemes are considered and integrated. We have discussed these needs in detail, and our own proposals to address them, in our recent submissions to the Review of the ISP Framework,³ and in our rule change proposal of 18 February 2026.⁴

We recommend further consideration of our proposals and would welcome an opportunity to discuss them, and ongoing ISP reform, further.

Yours sincerely

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¹ https://www.aemc.gov.au/sites/default/files/2026-04/draft_determination.pdf; <https://www.aemc.gov.au/rule-changes/clarifying-treatment-jurisdictional-policies-and-system-costs-isp>.

² https://www.aemc.gov.au/sites/default/files/2025-11/jec_-_submission_to_erc406_consultation_paper.pdf.

³ <https://www.aemc.gov.au/market-reviews-advice/review-integrated-system-plan-framework>.

⁴ <https://www.aemc.gov.au/rule-changes/co-optimisation-energy-resources-integrated-system-plan>.