

Mr John Pierce
Chairman
Australian Energy Market Commission
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Lodged online

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Dear Mr Pierce,

RE: ERC0203 - Draft Rule Determination – Non-scheduled generation and load in central dispatch Rule 2017

Thank you for the opportunity to comment on the *Draft National Electricity Amendment (Non-scheduled generation and load in central dispatch) Rule 2017*. As the peak body for the health and community services sector in South Australia, the South Australian Council of Social Service (SACOSS) has an established history of interest, engagement and provision of proposed advice on the necessary market mechanisms for and regulation of essential services. Our research shows that the cost of basic necessities like electricity impacts greatly and disproportionately on vulnerable people. Our advocacy is informed by our members and direct consultations with consumers and other consumer organisations: organisations and individuals who witness and experience these impacts in our community.

SACOSS generally supports the Commission's decision not to make a rule in this context. Whilst SACOSS concurs with the Commission that the materiality of the issue is insufficient to warrant a change in the rules, at present, we note that AEMO has recently put in place interim procedures requiring all utility-scale batteries above 5MW to be scheduled generators/loads, potentially indicating that perhaps there is more to this issue than first appears¹. SACOSS notes that although the proposed changes only apply to a limited number of generators and therefore, there would be limited impact on pre-dispatch forecasting accuracy, the speed and likelihood of further changes in the distributed generation model in a short space of time, may see scenarios arise that would cause this issue to again be investigated. SACOSS notes and agrees that AEMO's pre-demand forecasts are relatively efficient and that forecasting errors cannot be said to be primarily because of non-scheduled generation and load. SACOSS would always be extremely concerned about the cost impacts of any proposed changes which would vastly outweigh the benefits.

We thank you in advance for consideration of our comments. If you have any questions relating to the above, please contact SACOSS Senior Policy Officer, Jo De Silva on (08) 8305 4211 or via jo@sacoss.org.au.

Yours sincerely,

Ross Womersley
Chief Executive Officer

¹ https://aemo.com.au/-/media/Files/Electricity/NEM/Participant_Information/New-Participants/Interim-arrangements-for-utility-scale-battery-technology.pdf