

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235



Lodged online

8 August 2017

Dear Mr Pierce,

Marjorie Black House
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RE: ERC0211 - Draft Rule Determination - National Electricity Amendment (Managing power system fault levels) Rule 2017

Thank you for the opportunity to comment on the *Draft National Electricity Amendment (Managing power system fault levels) 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 is supportive of the Draft Determination for Managing power system fault levels as we concur that falling system strength is an emerging issue, particularly in South Australia with the high penetration of wind and solar. SACOSS supports requirements on network service providers (NSPs) to maintain the system strength at generating system connection points above an agreed minimum level and agrees that “NSPs have a holistic perspective of their networks and are best placed to manage the risks associated with this obligation”¹. SACOSS welcomes proposed provision for new connecting generators to 'do no harm' to the minimum level of system strength being provided to any nearby generating system connection points. SACOSS supports the draft rule transitional arrangements.

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 AEMC (2017) Draft Determination on Managing power system fault levels p.ii