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Michael Bradley
Australian Energy Market Commission
PO Box A2449
Sydney South, New South Wales 1235

Project number: ERCO203

Dear Michael

Draft rule determination: non-scheduled generation and load in central dispatch

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (MEA Group) thank the AEMC for the opportunity to provide comments in relation to the draft rule determination on “non-scheduled generation and load in central dispatch”.

MEA Group is the owner and operator of the Mt Mercer and Mt Millar Wind Farms as well as Powershop Australia, an innovative retailer committed to providing lower prices for customers which recognizes the benefits for customers of a transition to a more renewable based and distributed energy system.

With Mt Millar being a non-scheduled generator and Powershop being responsible for significant load within the NEM we are well positioned to understand the implications of the proposed rule change.

We concur with AEMC’s position as set out in the draft rule determination and in particular consider that the proposed rule change:

- would lead to significantly increased costs and burdens on consumers and participants;
- would be unlikely to substantially enhance accuracy of dispatch outcomes;
- may discourage load from being price responsive with consequential negative impacts on price; and
- would introduce unnecessary complications and uncertainty into a market undergoing significant transformation.

Given the above, we do not believe the draft rule change is consistent with achievement of the National Electricity Objective.

If you have any further questions please feel free to contact me.

Yours sincerely

Ed McManus
Chief Executive Officer
Meridian Energy Australia