

12 September 2017

Mr John Pierce  
Chairman  
Australian Energy Market Commission

10 Eagle Street  
Brisbane QLD 4122  
T 07 3347 3100

By email

Dear Mr Pierce

**Submission to consultation paper – National Electricity Amendment (Pricing during markets suspension) Rule 2017**

AEMO welcomes the opportunity to make a submission on the AEMC's draft pricing during markets suspension Rule.

A clear intention of this rule proposal is to remove barriers to the automation of suspension pricing. AEMO's design work for the automation of the systems is largely complete and has led to the identification of a low likelihood scenario that merits clarification in the Rules.

The proposed drafting clarifies that in all instances when pricing solutions are brought forward from a previous interval price scaling will not occur following subsequent application of the market suspension pricing schedule.

Two scenarios have now been identified that result in pricing solutions being brought forward from a previous dispatch interval:

1. Following identification of a manifestly incorrect input
2. Following a missed dispatch interval under 3.8.21(b).

Scenario 1 was already captured in the wording of AEMO's original proposed draft rule. We propose an adjustment to draft clause 3.14.5(m1) to also capture scenario 2, as follows (additional wording underlined):

Proposed 3.14.5(m1):

Paragraph (m) does not apply to a dispatch price at another regional reference node that has been replaced in accordance with clause 3.9.2B, or where clause 3.8.21(b) applies.

We thank the AEMC for its consideration of this clarification.

Yours sincerely



Peter Geers

**Executive General Manager Markets**