



7 November 2013

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged (online): <http://www.aemc.gov.au>

National Electricity Amendment (AER Authorisation of Software Changes by AEMO) Rule 2013 – Consultation paper

The Energy Supply Association of Australia (esaa) welcomes the opportunity to make a submission to the Australian Energy Market Commission (AEMC) on the Australian Energy Regulators (AER) rule change request.

The esaa is the peak industry body for the stationary energy sector in Australia and represents the policy positions of the Chief Executives of 36 electricity and downstream natural gas businesses. These businesses own and operate some \$120 billion in assets, employ more than 51,000 people and contribute \$16.5 billion directly to the nation's Gross Domestic Product.

esaa acknowledges that it is important to look for ways to improve efficiency in the National Electricity Market. While the proposed change may have merit, all market participants are dependent on the Australian Energy Market Operator's (AEMO's) systems and can be significantly impacted by any changes. As such, the esaa considers the rule change request should follow the normal rule change process to allow a full assessment of the implications and ensure appropriate checks and balances are in place.

The impact of conducting a more thorough process may appear to be low, as the consultation paper notes the AER currently plays a limited role in approving any changes to AEMO's software. A normal rule change process would allow for a robust analysis and debate of the issues identified by the AEMC including:

- the obligations placed on AEMO to appropriately maintain the IT Change Management Procedures Manual;
- the clarity of the current procedure; and
- using Chapter 8 dispute resolution process.

Any questions about our submission should be addressed to Fergus Pope, by email to fergus.pope@esaa.com.au or by telephone on (03) 9205 3107.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kieran Donoghue', is written over a light blue horizontal line.

Kieran Donoghue
General Manager Policy