

19 August 2021



Kate Degan  
Director  
Australian Energy Market Commission  
15/60 Castlereagh Street  
Sydney NSW 2000

*Submitted online.*

Dear Ms Degan,

### **Generator registrations and connections rule change draft determination**

The Public Interest Advocacy Centre (PIAC) is leading social justice law and policy centre. Established in 1982, we are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. PIAC builds a fairer, stronger society by helping to change laws, policies and practices that cause injustice and inequality. The Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in NSW. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets.

PIAC welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) draft determination on the generator registrations and connections rule change.

PIAC supports the AEMC's draft determination not to reduce the threshold for classifying generators as non-scheduled from 30MW nameplate capacity to 5MW. We consider doing so would have been a barrier to entry for new generators and would have imposed unnecessary burden on participation in the wholesale market. This would reduce competition in wholesale generation, likely putting upward pressure on electricity prices.

PIAC supports changes to ensure the market operator's registration, exemption, and classification process is more transparent and certain for stakeholders.

PIAC welcomes the opportunity discuss these matters further with the AEMC.

Yours sincerely,

**Anna Livsey**  
Policy and Communications Officer, Energy and Water  
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6520  
E-mail: [alivsey@piac.asn.au](mailto:alivsey@piac.asn.au)

Level 5, 175 Liverpool St  
Sydney NSW 2000  
Phone: 61 2 8898 6500  
Fax: 61 2 8898 6555  
[www.piac.asn.au](http://www.piac.asn.au)  
ABN: 77 002 773 524