

22 March 2021

James Tyrrell  
Senior Adviser  
Australian Energy Market Commission



Sent electronically

Dear Mr Tyrrell,

**Submission to Implementing a General Power System Risk Review draft determination**

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to the AEMC's draft determination on Implementing a General Power System Risk Review (GPSRR).

PIAC supports the AEMC's proposed more preferable rule that extends the scope of AEMO's current Power System Frequency Risk Review to become an annual GPSRR.

PIAC supports allowing AEMO the discretion to prioritise which risks to examine in each review. We strongly support the requirement for AEMO to engage publicly with network businesses and other stakeholders in determining these priorities as well as AEMO's proposed methodology and assumptions to ensure transparency and build confidence in the GPSRR.

**Continued engagement**

PIAC would welcome the opportunity to meet with the AEMC and other stakeholders to discuss these issues in more depth.

Yours sincerely,

**Miyuru Ediriweera**

Senior Policy Officer, Energy and Water  
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6525  
E-mail: mediriweera@piac.asn.au

**Craig Memery**

Policy Team Leader, Energy and Water  
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6522  
E-mail: cmemery@piac.asn.au