



Level 15, 459 Collins Street, Melbourne, 3000

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Mr Benn Barr  
CEO, Australian Energy Market Commission  
Lodged on AEMC website

17 December 2020

Dear Mr Barr,

**Response to Draft rule determination - *Semi-scheduled generator dispatch obligations***

The Clean Energy Investor Group (CEIG) welcomes the Australian Energy Market Commission (AEMC)'s consultation process on the draft rule determination on *Semi-scheduled generator dispatch obligations* (the Draft Determination) which was published on 19 November 2020 following a rule change request from the Australian Energy Regulator (AER).

CEIG represents domestic and global renewable energy developers and investors, with around 5GW of installed renewable energy capacity across 49 power stations and a combined portfolio value of over \$9 billion. CEIG strongly advocates for an efficient transition to a clean energy system from the perspective of the stakeholders who will provide the low cost capital needed to achieve it.

As noted in two previous submissions to the AER on this topic, CEIG agrees that generator compliance with dispatch expectations is critical for system security. Through the AER's proposed rule change, the obligations of semi-scheduled generators (SSGs) will effectively align with those of scheduled generators while allowing for flexibility to deal with genuinely unexpected variation in weather in both upward and downward directions.

CEIG welcomes the AEMC's Draft Determination to make a draft rule that aligns with the AER's proposal. This rule change will close an important gap to avoid economic deviation becoming a major system challenge, at little new cost or burden on SSGs and other market participants. CEIG notes the AEMC's proposed drafting changes to better reflect and clarify the policy intent.

CEIG remains supportive of retaining the narrow focus on negative price curtailment issues for this proposed rule change, as advocated by the AER and supported by industry and CEIG looks forward to further consultation by the AER and AEMC on those issues.



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CEIG thanks the AEMC for the opportunity to provide feedback on the AER's proposed rule change request. CEIG looks forward to the publication of the final determination and continued engagement with the AEMC on this issue. Please contact us at [secretariat@ceig.org.au](mailto:secretariat@ceig.org.au) if you would like to discuss any elements of this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S/Corbell".

Simon Corbell  
**Chairperson**  
*Clean Energy Investor Group*