

21 November 2023

David Hatfield
Director, Competition Exemptions
Australian Competition & Consumer Commission (ACCC)
Lodged online via the [public register](#)

Dear Mr Hatfield,

Response to Australian Energy Market Operator – Application for Authorisation AA1000643 – AEMO’s submission in response to the ACCC’s draft determination

The Clean Energy Investor Group (CEIG) welcomes the opportunity to provide feedback on the Australia Energy Market Operator (AEMO)’s response to the Australian Competition & Consumer Commission (ACCC)’s draft determination on the authorisation for coordination between the Australian Energy Market Operator (AEMO) and current and future AEMO Industry Participants on the scheduling of System Works (the draft determination) published on 15 November 2023.

CEIG represents domestic and global renewable energy developers and investors, with more than 16GW of installed renewable energy capacity across more than 76 power stations and a combined portfolio value of around \$38 billion. CEIG members’ project pipeline is estimated to be more than 46GW across Australia. CEIG strongly advocates advocate for an efficient transition to clean energy with a focus on the stakeholders who can provide the cost-effective capital required for this transition.

Key Points

- **CEIG supports AEMO’s proposal to seek authorisation for a period of 18 months rather than to 30 June 2026.**
- CEIG agrees with AEMO’s that this amended timeframe **will allow them to effectively utilise forums to address critical challenges during upcoming summer periods, regarding weather events and potential capacity constraints.**
- **CEIG is in favour of AEMO’s proposal for a longer-term regulatory solution** to manage outages during the energy transition, noting it will be subject to public consultation.

CEIG appreciates the ACCC’s invitation to provide further input regarding AEMO’s

response to the draft determination and welcomes the ACCC's interest in gathering further feedback on AEMO's proposed amendment.

CEIG notes that since our previous submission on the ACCC's draft determination on the application for authorisation AA1000643, AEMO has proposed an amendment to the term of authorisation for a period of 18 months rather than until 30 June 2026.

CEIG supports AEMO's proposal to amend the authorisation term to 18 months rather than ending on 30 June 2026. CEIG concurs with AEMO's view that this timeframe will allow them to utilise forums effectively to address challenges during upcoming critical summer periods, especially concerning weather events and potential capacity limitations.

As stated in our previous submission on the ACCC's draft determination, CEIG does not support the ACCC's proposal to not grant authorisation for coordination between AEMO and current and future AEMO Industry Participants on the scheduling of System Works raised by ACCC in its October 2023 draft determination. CEIG believes that there is a net public gain for the public interest if AEMO continues to engage with market participants. CEIG also notes in our previous submission that the interim authorisation includes measures to prevent collusion, and there have been no reported issues from the ACCC to date.

CEIG supports in principle AEMO's proposal for a longer-term regulatory solution to manage outages amid the energy transition, noting it will be subject to public consultation.

CEIG thanks the ACCC for the opportunity to provide feedback on its draft determination and looks forward to continued engagement on those issues. Our Policy Director can be contacted at marilyne.crestias@ceig.org.au if you would like to further discuss any elements of this submission.

Yours sincerely,



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