



15 January 2021

Mr Nino Ficca
Interim Chief Executive Officer
Australian Energy Market Operator

Lodged via email: StakeholderRelations@aemo.com.au

Dear Mr Ficca,

Renewing AEMO's Engagement Model – Response Paper

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in renewable energy and energy storage, along with more than 7,000 solar and battery installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC welcomes the opportunity to comment on the Australian Energy Market Operator's (AEMO's) renewing AEMO's engagement model response paper. We are pleased to see that AEMO has taken on board much of industry's earlier feedback in this iteration of the proposed structure for its forums and working groups. In particular, we welcome AEMO's adoption of a framework that seeks to collaborate, rather than merely inform. Consequently, we broadly support the proposed structure.

The CEC supports the creation of a new AEMO Stakeholder Forum. The paper outlines that AEMO intends that it will be a "broad and open new forum for representatives of all registered market participants and select consumer organisations". This would potentially exclude industry associations. We suggest that industry associations would benefit from participating in this forum as it would further enhance industry transparency, particularly for interested stakeholders that may not be registered participants and so therefore would not be direct participants in the forum, such as potential new entrants.

The CEC supports the creation of two new sub-committees focused on budget and fees, and technology matters. In relation to the budget and fees sub-committee, we welcome the opportunity to work with AEMO to select this sub-committee as suggested in the response paper.

Attachment 4 of the response paper outlines the key elements of the committee. At this initial point in the development of the committee's scope and composition, we consider six participants may be restrictive, particularly if the committee is to include representatives of AEMO's registered participants

as well as other interested parties, for example consumers. Attachment 4 also notes that the sub-committee will receive early insight into AEMO cost drivers, budget and corporate plan priorities. We suggest this should be expanded to afford committee members an opportunity to scrutinise and provide feedback on these prior to their finalisation.

The response paper also notes that the budget and fees sub-committee is subject to the outcomes of AEMO's governance review. The CEC is keen to understand more about what this governance review entails and whether there will be an opportunity for stakeholder engagement on the review.

The CEC supports adjusting and reinvigorating the NEM Wholesale Consultative Forum as the AEMO Markets Forum. Given the new forum will cover both electricity and gas, we suggest that AEMO group electricity agenda items together and gas agenda items together as not all forum participants will have an interest in both topics. This will make it easier for stakeholders to attend the parts of the meeting most relevant to them.

The CEC supports AEMO undertaking a review of all working groups to consider potential efficiencies and reviewing and refreshing the Terms of References of those groups that will continue.

If you would like to discuss any of the issues raised in this submission, please contact me at lpatterson@cleanenergycouncil.org.au or on (03) 9929 4142.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lillian Patterson', written in a cursive style.

Lillian Patterson
Director Energy Transformation