

27 July 2017

Shari Boyd  
Director  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235



Dear Ms Boyd,

**Draft determination on non-scheduled generation and load in central dispatch**

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 disadvantaged and marginalised people. 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 the non-scheduled generation and load in central dispatch rule change.

PIAC supports the AEMC's decision to not make a rule. Further, PIAC supports the position put forward in many stakeholder submissions that any benefits from the proposed rule change would be minimal and would not outweigh the costs on parties of implementation.

PIAC supports measures that lead to more efficient wholesale market operation and operation of the power system as these costs are ultimately borne by consumers. However, PIAC considers there are other reforms possible which would have greater, more lasting impacts on market outcomes such as by better integrating demand response and storage into the wholesale market and unlocking their multiple benefits streams.

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

Yours sincerely,

**Craig Memery**  
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Public Interest Advocacy Centre

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