17 October 2017

Kris Funston
Executive General Manager
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235



Dear Dr Funston,

Submission to Five Minute Settlement rule change 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 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 draft determination for the five minute settlement rule change.

As stated in our submission to the directions paper, PIAC supports the rule change. PIAC considers it will lead to sustained lower costs for all consumers through greater efficiency in the wholesale electricity market and by helping to accelerate the introduction of new technologies. PIAC also agrees with the AEMC's analysis that participants will still be able to manage wholesale market risk under the draft rule.

PIAC understands that AEMO is able to update the necessary procedures and systems within the timeframe proposed, and on that basis, supports the AEMC's implementation timetable.

Continued engagement

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

Yours sincerely,

Craig Memery

Energy and Water Policy Team Leader Public Interest Advocacy Centre

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