

11 November 2021



Anna Collyer
CEO
Australian Energy Market Commission

Submitted electronically.

Dear Ms Collyer,

Extension of time and reduction in scope of the 2022 reliability standard and settings review

The Public Interest Advocacy Centre (PIAC) is leading social justice law and policy centre. Established in 1982, we are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. PIAC builds a fairer, stronger society by helping to change laws, policies and practices that cause injustice and inequality. The Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in New South Wales. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets

PIAC is responding to the Australian Energy Market Commission's (AEMC) consultation on whether the rule change extending the time and reducing the scope of the 2022 reliability standard and settings review should be deemed a non-controversial rule change.

PIAC does not consider the proposed rule meets the definition of a non-controversial Rule under section 87 of the National Electricity Law (NEL). Therefore, it should not be subject to the expedited rule making process under s.96 of the NEL.

PIAC supports Smart Energy Council's submission on this matter and the reasons for objecting expressed in the submission.

Additionally, PIAC considers the proposal in the rule change to shift the price setting role from the Reliability Panel to the Energy Security Board would likely erode investor certainty in the market, raising the cost of capital for energy investment. This would not be in the long-term interest of consumers and is another reason for not expediting the rule change.

PIAC would welcome the opportunity discuss these matters further with the AEMC.

Yours sincerely,

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Public Interest Advocacy Centre

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