

Our Ref: 168890629  
Your Ref: ERC0396  
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16 July 2024

Anna Collyer  
Chair  
Australian Energy Market Commission  
GPO Box 2603  
SYDNEY, NSW, 2001

Dear Ms Collyer

**Re: Enhancing the integrated system plan to support the energy transmission**

The Australian Energy Regulator (AER) welcomes the opportunity to respond to the Australian Energy Market Commission's (AEMC) consultation paper on Enhancing the integrated system plan to support the energy transmission.

The AER broadly supports the implementation of the recommendations from the review of the Integrated System Plan (ISP) conducted by the Energy and Climate Change Ministerial Council. This consultation paper jointly considers three proposed rule change requests, which seek to implement recommendations from that review. If implemented, these rule changes will help ensure the ISP remains fit-for-purpose as the primary planning document for the National Electricity Market. It is important for the ISP to continue to appropriately consider the rapidly evolving nature of the energy system in Australia to ensure the delivery of reliable and secure energy to consumers is done at least cost.

One specific comment we want to raise in this submission relates to chapter 3 of the consultation paper, concerning the rule change request on *Improving consideration of demand-side factors in the ISP* (rule change request two). At page 17, the consultation paper notes that the proponent has recommended AEMO develop the framework, methodology and guidance material on accessing data and information on the uptake and orchestration of consumer energy resources (CER) and distributed resources and seeks feedback on this proposal. We consider AEMO is the most appropriate market body to formulate this guidance, in consultation with the AER. AEMO will have a greater understanding of the level of granularity required for data and information to be a useful input to the ISP. This approach will best support the aim of rule change request two, being to ensure AEMO can improve its consideration of demand side factors in the ISP. It may also

provide more flexibility for information requirements to be updated as changing circumstances require, than if direct obligations on Distribution Network Service Providers were set out in the rules.

We appreciate the opportunity to provide feedback on the consultation paper and welcome the chance to continue engaging on this rule change proposal.

Yours sincerely



Danielle Chifley  
A/g General Manager  
Policy Branch

Sent by email on: 16.07.2024