# SSC High Level Implementation Assessment (HLIA) Feedback

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| Initiative | Shortening the Settlement Cycle |
| Respondent Name:  |  |
| Organisation Name:  |  |
| Stakeholder type:  | **[ ]** Financially Responsible Market Participant **[ ]** Metering Data Provider **[ ]** Other: |
| Date of response: |  |

Please note that feedback on this HLIA is distinct from submissions to the AEMC's formal rule change process. AEMO is seeking feedback specifically on implementation matters given the content of the draft rule. Any feedback or submissions related to the rule change or draft determination should be provided to the AEMC as part of its rule change process.

AEMO welcomes any stakeholder feedback on this SSC Draft HLIA by Monday, 14 October 2024. Feedback by Monday 30 September will be used to inform AEMO’s submission to the AEMC rule change. Comments should be sent via email to NEMReform@aemo.com.au.

## Feedback on the HLIA

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| KEY FEEDBACK AREAS | PARTICIPANT COMMENT / FEEDBACK AND/OR QUESTIONS  |
| 1. Market design* To what extent has AEMO appropriately captured the SSC market design based on the AEMC’s SSC draft rule? What changes do you propose and why?
* AEMO considers that a relatively short transition period would be preferable. Do you agree and why?
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| 3. Key AEMO impacts* To what extent have the key impacts to AEMO’s processes from the SSC draft rule been appropriately captured? What changes do you propose and why?
* What are your views on the importance of maintaining the same level of exceptions in an earlier final statement under the SSC draft rule and of allowing market intervention settlement to wait until a 20 week revision?
* Do you agree that an additional ‘R0’ revision at business day 20 (Pathway 3) will alleviate the need to enhance metering data exception processes and represents a suitable timeframe for inclusion of market intervention settlement amounts.
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| 4. AEMO procedure impacts* To what extent have the impacts to new and existing market procedures from the SSC draft rule been appropriately captured? What changes do you propose and why?
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| 5. AEMO system impacts* To what extent have the potential impacts to AEMO systems from the SSC draft rule been appropriately described? What changes do you propose and why?
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| 6. Implementation pathway* To what extent have the key SSC implementation considerations been appropriately described?
* In Section 6, AEMO has proposed alternative timing for two implementation components if pathway 1 is adopted- the metering exception management interface and security deposit interface. Do you agree with AEMO’s suggested timeframes for these components, and are there any other relevant considerations for the timing of the incentive mechanism?
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| 7. Participant impact assessment and readiness* To what extent do you agree with the impacts AEMO has identified for each stakeholder type? What changes do you propose and why?
* What is the extent of the operational impacts to MDPs if tighter exception resolution timeframes are implemented under Pathway 1? What risk or other factors should be included?
* What impacts do market participants identify under Pathway 2 if exceptions and market intervention settlements are not resolved until R1? What is the change to these impacts under Pathway 1 and Pathway 3?
* What are your views on each of the elements of the indicative readiness approach and their timings?
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| 8. Related reforms* To what extent have the related reforms and their interaction with SSC been appropriately identified? What changes do you propose and why?
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| General* AEMO would appreciate feedback on the structure and content of this HLIA, to help inform the next version.
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