

12 January 2021



Stakeholder Relations
Australian Energy Market Operator

Submitted via email to stakeholderrelations@aemo.com.au

Dear Stakeholder Relations,

Renewing AEMO's engagement model – response paper

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 people who are marginalised and facing disadvantage. 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 Australian Energy Market Operator's (AEMO) response paper on renewing its engagement model.

PIAC supports AEMO's intent to pursue an uplifted business as usual model for its engagement. We consider large changes to the structure of AEMO's engagement would not be of significant benefit to consumers and would not address some of the key issues existing in AEMO's current approach.

We agree with the key areas for improvement AEMO highlights emerged from submissions and forums. In particular we support:

- Sharing emerging issues earlier, before deciding on solutions.
- More two-way collaborative discussion and consultation.

We highlight the Wholesale Demand Response consultation process, which has been taking place over the past few months as an example of good-quality stakeholder engagement that embodies a number of the best-practice principles outlined in the response paper.

PIAC supports AEMO creating a Stakeholder Forum instead of Executive Advisory Panels, and its decision to allow participant organisations to nominate a non-executive representative for the forum.

AEMO proposes establishing a budget and fees sub-committee within the Stakeholder Forum, and seeking support from industry associations in selecting its members. As AEMO's budget and fees will be recovered from consumers, PIAC recommends a consumer representative be included on the sub-committee and consumer bodies' involvement in selecting members.

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We strongly support AEMO's proposal to maintain the Consumer Forum. This forum is key means of consumer advocates engaging with AEMO in a two-way, open manner, and provides an opportunity for advocates to hear the concerns and ideas of others.

We look forward to working with AEMO to implement improvements to its engagement model and welcome the opportunity to discuss these matters further.

Yours sincerely

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