

28 August 2020

Dear AEMO Stakeholder Relation team,

PLUS ES welcomes the opportunity to provide feedback to Australian Energy Market Operator’s (AEMO) Consultation – Renewing AEMO’s Engagement Model.

PLUS ES participates in AEMO’s electricity related forums and working groups which may potentially impact metering services assets and data; operational and system processes. We are supportive of AEMO’s initiative to renew their engagement model with the aim to:

- Improve transparency, consistency, and collaboration across our energy industry forums, and
- Work flexibly both on problem-solving and considering future issues as well as delivering to immediate functional concerns.

Whilst there are challenges with current engagements, we also acknowledge that in the forums we attend, there has been a concerted effort in recent times to achieve the above-mentioned objectives/values.

Reviewing the three AEMO proposed options, irrespective of which option is implemented, it needs to be underpinned by practices which deliver the identified aims/values. The proposed structures alone will not deliver the intended objectives. PLUS ES’ feedback on the specific options are noted in the table below.

Item	Details
Option 1 – uplift business as usual	<ul style="list-style-type: none"> • PLUS ES agrees with AEMO’s approach. • Recommend a review and the incorporation of practices which will additionally deliver an increased level of collaboration and flexibility. • Propose a hybrid which combines Option 1 and forums, which enable a more coordinated and targeted approach.
Option 2 – uplift and re-align business as usual	<ul style="list-style-type: none"> • Not all participants are integrated business and without further detail it is hard to determine the efficiencies of aligning into streams. • From the diagrams provided in the option paper it appears the streams will not be fuel specific. Working groups have to be fuel specific, at minimum, to deliver and streamline efficiencies.

Option 3 – uplift and realign, with co-chaired strategic oversight	<ul style="list-style-type: none"> • Working groups should consist of regular and adhoc, instead of as needed: <ul style="list-style-type: none"> ○ Regular (a recurring frequency which is set): to deliver operational efficiencies and ‘absorb’ compliance deliverables (small-medium) ○ Adhoc (on a as needed basis and finite term): to deliver large compliant or operational initiatives.
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PLUS ES has also identified improvement opportunities for AEMO’s consideration which could enhance industry engagement and deliver further benefits:

- In addition to eliminating duplication with respect to forums and working groups there also appears to be a gap in a forum to support metering services or a contestable metering group.
- Cost benefit analysis: It is very easy for participants to strongly support initiatives or enhancements for perceived benefits, especially if the cost outlay is minimal to them. For greater efficiency, it would be beneficial if cost benefit analysis were performed on proposed enhancements with impacted participants prior to their inclusion in consultations. If this is being completed it is not visible or widely known.
- Collaboration: Discussions have been and continue to be in some forums/working groups one sided/directional. A facilitation of collaborative forums between all stakeholders would deliver greater benefits and more efficient operations. These forums could be established at the design level where industry could contribute to the solution, especially with industry compliant initiatives.
- Consultations: Propose at least one consultation stage to be an interactive session after industry has had the opportunity to provide feedback.
 - Whilst the associated AEMO draft/final report papers provide detail, in some instances the factors which determine an outcome are not clearly defined.
 - Time is not always available to perform a review and analysis of all written feedback.
- Transparency: This also underpins the above-mentioned opportunities.

A level of transparency fosters stronger relationships especially if stakeholders believe that their insights are been considered. It could also mitigate resistance to change and even encourage a higher degree of collaboration.

There has been a shift to effect or increase transparency in some forums/working groups or engagement with AEMO team members. Additionally, there are opportunities

to achieve a consistent level of transparency across all forums/working groups. Areas for increased transparency:

- Cause and effects
 - Adjudications of proposed solutions/feedback
 - Future direction/ Industry impacts
- Communications: whilst there is a level of communication, in some instances it is not sufficient, or it does not reach the wider audience. This gives rise to gaps of information and missed opportunities for stakeholders to have a voice or present a position on industry reform/s. PLUS ES proposes a regular form of communication such as the AEMC update would deliver value to the wider stakeholder audience. It could summarise on a page:
 - Activities
 - New consultations
 - Upcoming dates of events such as consultation submission dates, publish dates of final docs etc

This vehicle of communication or similar, would allow the information to reach a wider audience of stakeholders outside the specific forum/working group. The scope could be expanded to include other information AEMO's stakeholders would find valuable.

PLUS ES would welcome any further discussion in relation to this submission.

If you have any questions or wish for further discussion, please contact Helen Vassos on 0419 322 530 or at Helen.vassos@pluses.com.au.

Sincerely,



Darren Ferdinands

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