

10 November 2023

Aaron Yuen
Director, Analysis and Reform, Energy
Essential Services Commission
Level 8, 570 Bourke Street
MELBOURNE VIC 3000

Dear Aaron,

Consultation for revocation of Electricity System Code

AEMO Victorian Planning (AVP) welcomes the opportunity to make this submission in response to the Essential Services Commission's consultation for the revocation of the Victorian Electricity System Code. AEMO notes that it does not speak for, and has not consulted with, other electricity industry participants in relation to the revocation of the Code.

Although AVP currently refers to the obligations contained within Electricity System Code, we support the Commission's view that most obligations in the code are primarily regulated through the national energy framework. However, there are some clauses specific to Victoria, highlighted below, which we consider appropriate to retain in transmission / distribution licences and other Codes of Practice.

Clauses 100.4.1 to 100.4.3

In the protection and control requirements for new connections below 100kV, AVP requires connecting parties to comply with the HV Protection sub-Code. AVP is currently supported in this requirement through the existence of clauses 100.4.1 to 100.4.3 of the System Code.

One possible way forward is for the HV Protection sub-Code to be hosted in a location agreeable to distribution businesses and for it to also be referred to in licences (including transmission, distribution and generation, where connected or connecting below 100kV), which could be amended to require parties connecting to the declared transmission system to comply with the HV Protection sub-Code.

Clause 110.2.1(a) and (b)

AEMO relies on the System Code each year when it requests information from Distribution Network Service Providers in relation to supply quality. This information is relevant to the energy transition. Clause 110.2.1(a) outlines supply quality obligations and clause 110.2.1(b) outlines the process that must be followed. AEMO requests that these clauses be retained. One possible way forward is for Electricity Distribution licences to be amended to reflect sub-clauses 110.2.1(a) and (b).



AEMO has no objection to the revocation of the remainder of the Electricity System Code by the Essential Services Commission.

If you have any comments or queries, please let me know.

Yours sincerely,

Ashley Lloyd
Manager, Victorian Transmission Planning