



13 February 2019

COAG Energy Council Secretariat  
GPO Box 787  
Canberra ACT 2601

Submitted via email: [energycouncil@environment.gov.au](mailto:energycouncil@environment.gov.au)

Dear Secretariat,

Stanwell welcomes the opportunity to comment on the Review of the Australian Energy Market Commission's (AEMC's) Regulations.

The COAG Energy Council has proposed that Section 24(3) and 24(4) of the Regulations be amended to include the Energy Security Board (ESB) as one of the bodies to whom the AEMC can provide confidential information.

Established in August 2017 with a three year term, the ESB has been tasked with providing a whole-of-system oversight to the Energy Council on energy security, reliability and affordability in the National Electricity Market (NEM). As stated in its terms of reference, its core role is to act as a coordinator that facilitates better planning and interaction between governments, the Energy Council and the market bodies.

It was stressed that the ESB would not affect or modify the existing legal functions and responsibilities of the three market bodies, but rather coordinate the work of these bodies and provide a consolidated interface to the Energy Council.

As the ESB is a transitional, coordinating body, Stanwell opposes regulatory changes that would endow the ESB the same level of access to confidential information as the permanent, primary market bodies.

In performing its role, the ESB generally does not need access to detailed information but should be leveraging the work of the market bodies. In the instance that certain information is required, it would be more prudent to address the need by exception rather than embed the ESB within the regulatory framework.



Thank you for your consideration of Stanwell's response to the issues paper. If you would like to discuss any aspect of this submission, please contact Luke Van Boeckel on 07 3228 4529.

Yours sincerely

A handwritten signature in grey ink, appearing to read "Luke Van Boeckel", is positioned below the "Yours sincerely" text.

**Luke Van Boeckel**  
**GM Modelling, Analytics and Regulatory Strategy**  
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