



6 February 2018

Jack Fitcher
Chief Financial Officer
Australian Energy Market Operator
GPO Box 2008
Melbourne Vic 3001

Submitted by email: jack.fitcher@aemo.com.au

Dear Mr Fitcher

Structure of Participant Fees in AEMO's Gas Markets – Consultation Paper

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Operator's (AEMO) Consultation Paper on the Structure of Participant Fees in AEMO's Gas Markets. In determining the structure of participant fees, Origin is supportive of the guiding principles of consistency, simplicity and transparency. It is in this context we have commented on elements of the existing gas market fee structure, as discussed below.

- *Period of fee structure:* A three year fee structure period provides adequate certainty and predictability for AEMO and market participants. It is also logical that AEMO's break-even period for recovering costs is aligned with this timeframe.
- *Declared Wholesale Gas Market (DWGM), Short Term Trading Market (STTM), Full Retail Contestability (FRC) Gas Markets, and Gas Statement of Opportunities (GSOO) fees:* Origin is broadly supportive of the existing fee structure associated with these market functions. It is also important AEMO minimises the overall cost of these fees over time.
- *Gas Bulletin Board (GBB) fees:* The benefits of the GBB accrue to a broad range of market participants (i.e. shippers, pipeline operators, producers and storage operators), as well as other users that access data for more than informational purposes. To ensure the costs associated with the GBB are recovered on an equitable basis therefore, Origin believes GBB fees should principally be recovered through a fixed charge on all users. This could be coupled with a volumetric charge (\$/GJ) on registered participants based on the volumes of gas produced, transported or stored.

If you wish to discuss any aspect of this submission further, please contact Shaun Cole at shaun.cole@originenergy.com.au or on 03 8665 7366.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy