



31 March 2014

Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

By email: GWCF_Correspondence@aemo.com.au

WHOLESALE MARKET AMDQ PROCEDURES - PROPOSED PROCEDURE CHANGE

Origin Energy Limited (Origin) welcomes the opportunity to comment on the Australian Energy Market Operator's (AEMO's) proposed Procedure change in relation to the Wholesale Market Authorised Maximum Daily Quantity (AMDQ) Procedures for the Declared Wholesale Gas Market (DWGM).

Origin supports the proposed Procedure change. In particular, we support the change initiated by the APA Group through the Gas Wholesale Consultative Forum to add a new validation where AEMO would confirm that a market participant holds firm contract capacity on an interconnected facility before processing the transfer of AMDQ or nomination of AMDQ Credit Certificates to a system withdrawal point.

In the event of a constraint, it is appropriate that gas dispatch is backed up by firm transportation rights in the DWGM and on the other side of the interconnect. This is intended to enhance the interoperability of the DWGM with adjacent contract carriage markets. In addition, in an environment of changing gas flow dynamics in the Eastern Australian market, this change could increase the certainty of gas flow from Victoria into New South Wales through Culcairn, particularly in the event of a constraint, thereby assisting to secure greater gas trade on the east coast.

Should you have any questions or wish to discuss further any detail of this submission, please contact Lillian Patterson on lillian.patterson@originenergy.com.au or (02) 9503 5375.

Yours sincerely,

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

Steve Reid
Manager, Wholesale Regulatory Policy