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Participant fees for the Consumer Data Right Declared NEM project

AGL Energy (AGL) welcomes the opportunity to provide feedback on the *Structure of participant fees for the CDR Declared NEM project* consultation paper.

AGL is a leading integrated essential service provider, with a proud 185-year history of innovation and a passionate belief in progress – human and technological. We deliver 4.3 million gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. We operate Australia's largest electricity generation portfolio, with an operated generation capacity of 11,208 MW, which accounts for approximately 20% of the total generation capacity within Australia's National Electricity Market.

Question 1

- a. Do stakeholders agree with AEMO's proposed approach as described in section 3.4.1 for recovery of the CDR declared NEM project costs?

We support AEMO's proposal to recover the estimated \$5M capital and \$410K ongoing p.a. costs from Retail Market Customers on a \$/NMI Basis as AEMO has suggested, but suggest allocating it through a separate CDR reform fee so that participants have full visibility over the fee.

- b. Do stakeholders agree that the CDR declared NEM project costs are recovered from Market Customers only? If not, which other Registered Participants should fees be recovered from?

Yes. We support this approach because if the fee was recovered from other participants, they would just pass those costs onto Market Customers anyway.

- c. Is there another fee structure that would be more appropriate for recovery of the costs of the CDR declared NEM project?

No.

Question 2

Is the fee metric used for Electricity Retail Markets fees appropriate to apply to the recovery of the CDR declared NEM project costs? If not, what metric/s is/are more appropriate?

Yes. We consider charging on a \$/NMI basis appropriate.

Question 3

AEMO proposes a start date for recovery of 1 July 2023. Do stakeholders consider this appropriate?

Yes. Recovery should commence as soon as possible.



Question 4

Are there any other issues relating to AEMO's recovery of the CDR declared NEM project costs that need to be considered?

We support AEMO's proposed 3 year recovery period.

If you have any queries about this submission, please contact Anton King on (03) 8633 6102 or aking6@agl.com.au.

Yours sincerely,

Liz Gharghori

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