



1 November 2018

Mr Andre Dauwalder
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Email: aemc@aemc.gov.au

Dear Mr Dauwalder

National Energy Retail Amendment (Minor Changes 2) Rule 2018

Origin Energy (Origin) welcomes this opportunity to provide comment to the Australian Energy Market Commission (the Commission) on the proposed Minor Rule Change 2. Origin agrees that the minor Rule seeks to clarify the intent of subrule 117 (1) of the National Energy Retail Rules.

Origin understands that the intent of the subrule 117 is that where a retailer's right to de-energise both electricity and natural gas arises under a dual fuel contract (ie one contract for both electricity and natural gas or a single bill is issued for both electricity and gas), a retailer is required to de-energise the natural gas supply first and give the customer an opportunity to engage with the retailer prior to their electricity supply being de-energised.

Origin has concerns that the proposed changes to subrule 117 as outlined in the Minor Rule Change 2 still does not make the intent of the subrule clear unless it is read in conjunction with the Rule Proposal. Rule Proposals are unlikely to be read in the future when interpreting rules. Origin therefore proposes the inclusion of the following words in red to the subrule to ensure the legal interpretation of the subrule is unambiguous.

s117 Timing of de-energisation where dual fuel market contract

(1) Application of this rule¹

This rule applies where a retailer and a customer have entered into a dual fuel market contract for the customer's premises and the retailer has the right to arrange for de-energisation of the ~~premises under this Division~~ customer's gas supply and the customer's electricity supply under this Division and the customer has a single contract for their gas supply and electricity supply, or a single bill is issued to a customer for their gas supply and electricity supply.

Origin believes clear and concise rules will ensure the market operates as intended. Should you have any questions or wish to discuss this proposed change further, please contact Caroline Brumby on (07) 3867 0863.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sean Greenup".

Sean Greenup
Group Manager, Retail Regulatory Policy
(07) 3867 0620
Sean.greenup@originenergy.com.au

¹ Note: the 'green wording' is the Commission's proposed amended wording.