AUSTRALIAN ENERGY MARKET COMMISSION

Final report

Compensation claim for opportunity costs – Origin

12 September 2024

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The AEMC reports to the energy ministers. We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the energy ministers.

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Executive Summary

1 Clause 3.14.6 of the National Electricity Rules (NER) and the Australian Energy Market Commission (AEMC or the Commission) compensation guidelines[1](Guidelines) set out a process for market participants to claim compensation for certain losses during an administered price period (APP) where the administered price cap (APC) or administered floor price is applied.[2]

2 The administered pricing compensation framework is designed to protect participants such as generators, scheduled network service providers, scheduled loads, ancillary service providers, and demand response service providers from losses during a price limit event to maintain the incentive for them to continue to supply (or consume) energy or services (as the case may be). In this way, administered pricing compensation supports a reliable supply of electricity to customers during price limit events.

3 This paper sets out the Commission's final decision regarding a claim from Origin Energy Electricity Limited (Origin) for administered pricing compensation related to the June 2022 APP.

4 Origin has made a compensation claim for opportunity costs only in respect of its Uranquinty, Quarantine and Mortlake gas-fired power stations in New South Wales, South Australia and Victoria following the application of the APC in Queensland (Qld), New South Wales (NSW), Victoria (Vic) and South Australia (SA) between 12 June 2022 and 15 June 2022.

5 The total amount of compensation (TCA) is determined by the Commission using the formula set out in the Guidelines:

- opportunity costs incurred over the relevant period(s)
- plus direct costs incurred in the eligibility period(s)
- minus actual revenue in the eligibility period(s)
- plus any other adjustments to the amount of compensation payable to be taken into consideration by the Commission, such as the subtraction of other forms of compensation payable to the claimant.[3]

6 Origin has claimed a total amount of [redacted] for opportunity costs compensation, related to a claimed forgone opportunity to sell its scarce gas resources into the Declared Wholesale Gas Market (DWGM) more profitably in a future period instead of generating into the NEM for the APP.

7 Origin is entitled to opportunity costs compensation.

8 Opportunity costs can be claimed where it is demonstrated that the claimant's plant had scarce capacity or resources as a result of a relevant commercial or technical limitation that applied over the relevant period. Opportunity cost means the value of the best alternative opportunity for an eligible participant to use that scarce capacity or resources more profitably during the application of a price limit event or at a later point in time.[4]

9 In accordance with the NER and Guidelines, the Commission seeks to answer two fundamental questions in assessing eligibility for opportunity costs compensation:

1 AEMC, Compensation guidelines, Final guidelines, 21 October 2021, https://www.aemc.gov.au/sites/default/files/documents/final_amended_compensation_guidelines.pdf

2 Further information on the background, context and purpose of administered pricing compensation is included in **Appendix A**. Information on the Commission's role and process for administered pricing compensation is included in **Appendix B**.

3 Figure 5.1 in the Guidelines.

4 Section 5.3.1. of the Guidelines.

1. Has the claimant demonstrated that it had scarce capacity or resources as a result of a relevant (technical or commercial) limitation?[5] If no, the claimant does not demonstrate a limitation and is unable to claim compensation.
2. If yes, has the claimant suffered the foreclosure of an alternative opportunity to use that scarce capacity or resource more profitably at the same point in time or at a later point in time[6] due to the imposition of the price cap?[7]

10 With regard to the first question, the Commission is satisfied that Origin has demonstrated a commercial limitation in regard to its gas-fired units which are the subject of its opportunity costs claim.

11 With regard to the second question, the Commission agrees with Origin that by generating electricity into the NEM during the APP, using its scarce gas resources, it foreclosed the opportunity to use the same gas resources to sell into the Victorian DWGM more profitably at a later point in time. Origin has provided sufficient information to the Commission to evidence that this was a genuine opportunity forgone.

12 The Commission has therefore determined that Origin has demonstrated that it is eligible for opportunity costs compensation under the relevant provisions of the NER and the Guidelines.

13 The Commission values Origin's opportunity costs based on the profit forgone and not the revenue forgone.

14 We consider that the value of the forgone opportunity should be the revenue associated with the alternative opportunity less the costs that would have been incurred in pursuing it. This means that the value of opportunity costs reflects the profit forgone and not the revenue forgone.

15 The Commission's approach to estimating Origin's forgone opportunity is to take:

- the quantity of gas associated with the forgone opportunity
- multiplied by the DWGM spot price of $40/GJ, the administered price cap in the DWGM for all of June 2022 through to late July 2022
- less the estimated costs that Origin would have incurred in pursuing the alternative opportunity, including the costs of storing and transporting the gas for the purposes of selling it on the DWGM.

16 The Commission's approach to valuing Origin's opportunity costs has the following features:

- It is a market-based approach consistent with the hierarchy of principles outlined in the Guidelines.
- It leaves the claimant in the position it would have been in had it pursued its alternative, more profitable, opportunity.
- It supports the objective of the compensation framework, which is to maintain the incentive to supply services during an APP, in that the approach is transparent and allows market participants to make informed decisions during a future APP.

17 In its draft opportunity cost methodology (DOCM), the Commission noted that to accurately reflect the change in profit that would have arisen in taking advantage of the alternative opportunity, an estimate of the costs incurred in realising the alternative opportunity is required. In order to determine the total compensation amount consistent with the formula, in addition to the opportunity costs, the Commission also requires estimates of the direct costs and revenue

5 Sections 5.3.2-5.3.3 of the Guidelines.

6 Section 5.3.1 of the Guidelines.

7 Clause 3.14.6(a) of the NER.

received during the eligibility period.

18 Origin has not submitted estimates of the costs associated with the forgone opportunity or the direct costs it incurred during the eligibility period. However, it has indicated that any forgone costs (for example, gas storage and transportation) are minimal and likely to be exceeded by any direct costs from the eligibility period, which it has not included in the claim.

19 The Commission has considered the rationale and information provided by Origin and determined that the assumption that the direct costs in the eligibility period and the forgone costs in the relevant period should be treated as being equal in the TCA calculation is reasonable and is, if anything, conservative. The Commission is therefore satisfied that a detailed investigation of these cost components is not necessary.

20 For the alternative opportunity proposed by Origin, the Commission has therefore concluded that forgone costs are equal to direct costs for the purpose of the calculation of the TCA.

21 Origin is to be paid compensation of $4,882,360.98 (ex GST).

22 The Commission is satisfied that:

- Origin is eligible to claim compensation for the eligibility periods commencing on 14 and 15 June 2022 as it had incurred a net loss on these trading days
- Origin notified the AEMC and the Australian Energy Market Operator (AEMO) of its intention to claim compensation in accordance with clause 3.14.6(h) and (i) of the NER
- the information provided by Origin to support and substantiate its claim complies with the Guidelines
- the opportunity costs to be awarded to Origin are consistent with the definition of opportunity costs outlined in the Guidelines.

23 The total compensation amount for Origin's claim is calculated as follows:

- opportunity costs incurred over the relevant period(s)
- plus direct costs incurred in the eligibility period
- minus actual revenue from the spot market
- minus directions compensation paid by AEMO for the eligibility periods.

Given the Commission has assumed that forgone costs are equal to or less than direct costs for this claim, the formula to be applied reduces to forgone revenue less actual revenue, minus directions compensation.

24 The Commission has determined that Origin is entitled to compensation in respect of its compensation claim, and that the amount of compensation that should be paid by AEMO is $4,882,360.98 (exclusive of GST).

25 The Commission will write to AEMO to advise of the total amount of compensation payable to Origin for each relevant eligibility period by trading interval, exclusive of GST. AEMO will then recover the cost of compensation from market customers who purchased energy from the spot market in the relevant eligibility periods in the cost recovery region(s).[8]

26 We considered stakeholder input in making our decision.

27 In June 2024, the Commission published the DOCM, which outlined Origin's proposed methodology for determining its opportunity costs and the methodology the Commission proposed to use.

8 Clause 3.15.10 of the NER.

28 The Commission received submissions on the DOCM pertaining to Origin's opportunity cost claim, from Origin and AGL Energy Limited (AGL):

- Origin provided supplementary information in response to the further evidence sought by the Commission in the DOCM.
- AGL noted that it considers the Commission's assessment for each claim to be appropriate, but that the Commission's methodology did not consider whether the claimant had the ability to supply gas into the DWGM to take advantage of alternative opportunity such that it was a real opportunity forgone.

29 In relation to the points raised by AGL, the Commission is satisfied on the basis of the information provided by Origin that it had the ability to supply gas into the DWGM during the period of the forgone opportunity.

30 On 15 August 2024, the Commission provided a draft decision to Origin for the purposes of consultation under clause 3.14.6(r) of the NER. The draft decision outlined the Commission's draft assessment of Origin's opportunity cost claim.

31 The Commission has taken all stakeholder submissions into account, including Origin's response to the draft decision, in making this final decision.

Contents

1 Overview of Origin's claim

On 22 June 2022, Origin provided notification of its intent to claim compensation in relation to the APP in Queensland, New South Wales, South Australia and Victoria between 12 June 2022 and 15 June 2022. On 29 June 2022, Origin provided notification of its intent to claim compensation in relation to the APP in New South Wales, South Australia and Victoria between 15 June 2022 and 23 June 2022.[9] For the purposes of this claim, this combined period is the APP to which the claim relates. These notifications were received within the prescribed timeframe in the NER.[10]

Origin is claiming compensation for its gas-powered power stations Uranquinty (NSW) Units 11 to 14, Quarantine (SA) Unit 5, and Mortlake (Victoria) Units 11 and 12. These units are scheduled generators registered to Origin.

The Commission commenced formal assessment of Origin's compensation claim on 16 May 2024. A timetable for determining Origin's compensation claim is set out in **Appendix C**.

This section summarises the submissions made by Origin in support of its claim.

1.1 Origin's opportunity cost claim

Origin is claiming opportunity costs in operating its power stations during the period commencing 4.05am on 14 June 2022 and ceasing 4.00am on 16 June 2022. Each trading day (or part of a trading day) within this period is a separate eligibility period for the purposes of this claim.[11]

The Commission notes that Origin has separately sought (and been awarded) direct cost compensation for generators not subject to this opportunity cost claim.[12]

1.1.1 Origin claims a commercial limitation

Origin claims it faced a commercial limitation during the APP as it was unable to respond to price signals to sell gas at higher prices in an alternative market. Origin claims it faced a commercial incentive to supply its gas into the DWGM owing to the higher prices available in the DWGM relative to using it to generate electricity into the NEM during the APP. For example, Origin claims it had a realised gas price of $26/GJ by dispatching into the NEM in Victoria on 15 June 2022, as compared to the DWGM administered price cap of $40/GJ it claims it would have received in its proposed alternative opportunity. The realised gas price of $26/GJ equates to an electricity price of approximately $277/MWh, using Origin's calculated heat rate.

Origin's three gas-powered generators, subject to the claim, were under AEMO direction notices to make additional dispatch capacity available intermittently throughout the APP. The directions, along with Origin's decision to continue to generate additional electricity into the NEM during the APP, led to Origin being unable to respond to the commercial incentive to allocate this gas supply to a different market.

1.1.2 Origin claims the foreclosure of an alternative opportunity during or after the price limit event

Origin claims the opportunity to use its gas resources more profitability was foreclosed during the price limit event. Specifically, Origin claims using its gas as fuel for its gas-powered generators

9 This latter claim was not pursued by Origin. This claim was intended to be a claim for compensation related to the market suspension period between 15 June 2022 and 23 June 2022.

10 Clause 3.14.6(i) of the NER.

11 Clause 3.14.6(a) of the NER.

12 Origin sought direct cost compensation for its Roma and Mt Stuart power stations. The final determination for this claim was published on 15 December 2022.

during the price limit event was less profitable than selling the gas into the DWGM in the same or future period.

Origin outlines that the allocation of its gas supply across markets is typically driven by price signals. Origin claims it had sufficient transportation and storage flexibility in its portfolio to supply the equivalent volume of gas consumed by its generators into the DWGM over the period from 31 May 2022 to 31 July 2022.

1.1.3 Origin's valuation of its claimed opportunity costs

Origin's proposed valuation methodology for determining its claimed opportunity costs is a market based valuation of its claimed forgone opportunity.

Origin's claim calculates the value of the forgone opportunity during the APP by outlining the quantity of gas usage that was used as fuel by its affected units to generate during the APP and multiplying it by the price it could have received for selling this same gas at a higher price in an alternative market, being the DWGM.

Origin's methodology does not deduct the costs, including gas purchase costs or additional costs it may have incurred, such as gas storage or transportation costs, in taking advantage of the alternative opportunity (or the direct costs actually incurred by Origin in generating during the APP).

Origin's claimed quantum of gas

Origin's claim calculates the *quantity* of gas usage as the total gas consumption used by its affected units to generate during the APP. This estimate is based on an assumption that no gas would have been used for dispatch into the electricity market in the event that it took advantage of the alternative opportunity.

The price at which Origin values this gas

The *price* is the amount Origin could have received for selling the same units of gas at a higher price in an alternative market, being the DWGM. The price is based on the spot prices that applied in the DWGM over the relevant period – the APC of $40/GJ. Origin argues that it would have received this amount for the full quantity of its gas as the DWGM cleared at this price for an extended period after the APP. Origin also states that, in its view, the $40/GJ price is a conservative estimate given there were opportunities to realise higher prices for the gas in the short-term trading markets (STTMs). Higher prices were recorded in the Sydney, Adelaide, and Brisbane STTMs in July 2022 where administered pricing did not apply.

1.2 Information provided by Origin and AEMO

Origin provided information to the Commission in accordance with the requirements in the Guidelines on 6 September 2023.

The Commission verified certain information provided by Origin with AEMO and received verification of the spot price and generation revenue earned by Origin during the period. AEMO notified the Commission of other forms of compensation that the claimant has received (and/or applied for) for the eligibility period.

Origin provided further information to support its claim in its submission to the draft opportunity cost methodology (DOCM) and in response to the Commission's draft decision, which was provided to Origin in August 2024.

The Commission notes Origin provided much of this additional information in confidence to assist the Commission's decision-making process. Therefore, only a portion of the additional information provided has been made public. Where required in this document, the Commission has discussed this additional information in a general form to not breach confidentiality requirements imposed by Origin.

1.3 Confidentiality

As acknowledged in the Guidelines, when performing its functions under clause 3.14.6 of the NER, the Commission is required to take all reasonable measures to protect from unauthorised use or disclosure information given to it in confidence.[13]

Origin made a claim of confidentiality in respect of its gas market purchases and gas supply strategy into the DWGM. It has also made a claim of confidentiality in respect of its claim calculation. Both claims are made on the basis that the information is commercially sensitive in nature.

The discussion of Origin's claim in this document is partly constrained in order to protect Origin's confidential information.

13 Section 24, Australian Energy Market Commission Establishment Act 2004. Section 31 of the National Electricity Law.

2 The Commission's assessment of Origin's claim

In assessing Origin's claim for compensation, the Commission has had regard to:

- its functions and the administered pricing compensation process under clause 3.14.6 of the NER
- the Guidelines[14]
- its powers under the National Electricity Law
- information and documents provided by Origin to support its claim, including any further information and documents provided in consultation with Origin pursuant to clause 3.14.6(r) of the NER
- submissions received on the draft opportunity cost methodology for Origin's claim
- information provided by AEMO in accordance with the Guidelines
- Origin's response to the draft decision.

This section outlines the Commission's assessment of Origin's eligibility to claim compensation and its opportunity costs methodology.

2.1 Eligibility to claim compensation

In the following sub-sections, the Commission seeks to answer the following questions regarding Origin's eligibility to claim compensation, including:

- Has the claimant demonstrated that it is an eligible party?[15]
- Has the claimant demonstrated that it had scarce capacity or resources as a result of a relevant limitation?[16]
- If yes, has the claimant suffered the foreclosure of an alternative opportunity to use that scarce capacity or resource more profitably at the same point in time or at a later point in time[17] due to the imposition of the price cap?[18]

2.1.1 Origin is a party eligible to apply for compensation

Origin meets the eligibility criteria set out in the NER in regard to making a claim for administered pricing compensation (subject to the requirement that it has incurred total costs during each eligibility period that exceed the total revenue it received from the spot market during that period).[19]

Origin is registered by AEMO as a generator under the NER, and the units Origin is claiming compensation for are classified as scheduled generating units under Chapter 2 of the NER, making Origin a party eligible to apply for compensation.[20]

14 AEMC, Compensation guidelines, Final guidelines, 21 October 2021. https://www.aemc.gov.au/sites/default/files/documents/final_amended_compensation_guidelines.pdf

15 Clause 3.14.6(b) of the NER and Section 2 of the Guidelines.

16 Sections 5.3.2 and 5.3.3 of the Guidelines.

17 Section 5.3.1 of the Guidelines.

18 Clause 3.14.6(b) of the NER.

19 Clause 3.14.6(b) of the NER.

20 Part 2 of the Guidelines.

2.1.2 Origin is a party eligible for opportunity costs compensation

Opportunity costs can be claimed where it is demonstrated that a claimant's plant had scarce capacity or resources as a result of a relevant limitation (commercial or technical) that applied over the relevant period. Opportunity cost means the value of the best alternative opportunity for an eligible participant to use that scarce capacity or resources more profitably during the application of a price limit event or at a later point in time.[21]

In determining claims for opportunity costs, the Commission must assess the claimant's eligibility and its opportunity cost methodology. The Commission must also apply the Guidelines,[22] consult with the claimant,[23] and take into account the submissions made in response to the DOCM.[24]

The Commission has determined that Origin has demonstrated that it is eligible for opportunity costs compensation under the relevant provisions of the NER and the Guidelines.

Origin faced a relevant commercial limitation related to the scarcity of gas

The Commission accepts that at the time of the APP there was limited supply of wholesale gas, demonstrated by significant increases in east coast wholesale gas prices above historical levels. These very high gas prices resulted in the DWGM APC being imposed for the first time in the DWGM's history. In the context of scarce gas resources, Origin faced a commercial incentive to supply into the Victorian Declared Wholesale Gas Market (DWGM) rather than the NEM during the APP due to a price difference between these two markets. A commercial incentive to sell the resource in another market due to price differences between markets is a commercial limitation specifically set out in section 5.3.3 of the Guidelines.[25]

Origin suffered the foreclosure of an alternative opportunity during the price limit event

The Commission's view is that the forgone opportunity claimed is consistent with an alternative opportunity as set out in the Guidelines. The Commission notes that Origin's use of its gas resources to supply electricity into the NEM (both voluntarily and pursuant to the directions notices issued by AEMO) would exclude it from using those same gas resources to sell into the DWGM in the same or future period more profitably.

The Commission accepts that:

- Origin could have received a higher price of $40/GJ for supplying the volume of gas in the DWGM. During the relevant period, Origin's sell prices for gas offered into the DWGM were generally set at or above the administered price cap. In addition, the Commission considers that the supply of this volume of gas into the DWGM would not have reduced the market clearing price below $40/GJ.
- Origin has the gas trading systems and governance arrangements to allow it to pursue this forgone opportunity. Origin has provided an overview of the risk management and governance framework that could allow it to take advantage of such an alternative opportunity.
- Origin has provided sufficient information and evidence from relevant business areas to suggest that it would have been able to access gas, storage and transportation capacity to be able to take advantage of the opportunity to sell gas into the DWGM.

21 Section 5.3.1. of the Guidelines.
22 Clauses 3.14.6(n) and 3.14.6(s)(2) of the NER.
23 Clause 3.14.6(r) of the NER.
24 Clause 3.14.6(s)(1) of the NER.
25 Section 5.3.3 sub-point 3 of the Guidelines.

- The directions issued to Origin to generate during the APP were most likely issued by AEMO to address issues arising in the NEM due to the price limit event.

2.2 The Commission's determination of the opportunity costs methodology

The Commission has determined that Origin has demonstrated that it is eligible for opportunity costs compensation under the relevant provisions of the NER and the Guidelines. This section outlines the Commission's approach to valuing Origin's opportunity costs.

2.2.1 The Commission's approach to valuing opportunity costs

The application of the compensation arrangements should ensure that participants with valid opportunity costs are no worse off from continuing to generate during the APP than if they had pursued the alternative opportunity. Claimants should therefore be compensated for any profit forgone as a result of continuing to supply or consume energy or services during the price limit event.

The Guidelines specify that for any type of claim, the total level of compensation is to be based on the formula given in Figure 2.1.

Figure 2.1: Equation to determine the total claimable amount

$$TCA = \sum_{t} (DC_t + OC_t + OTH_t - REV_t)$$

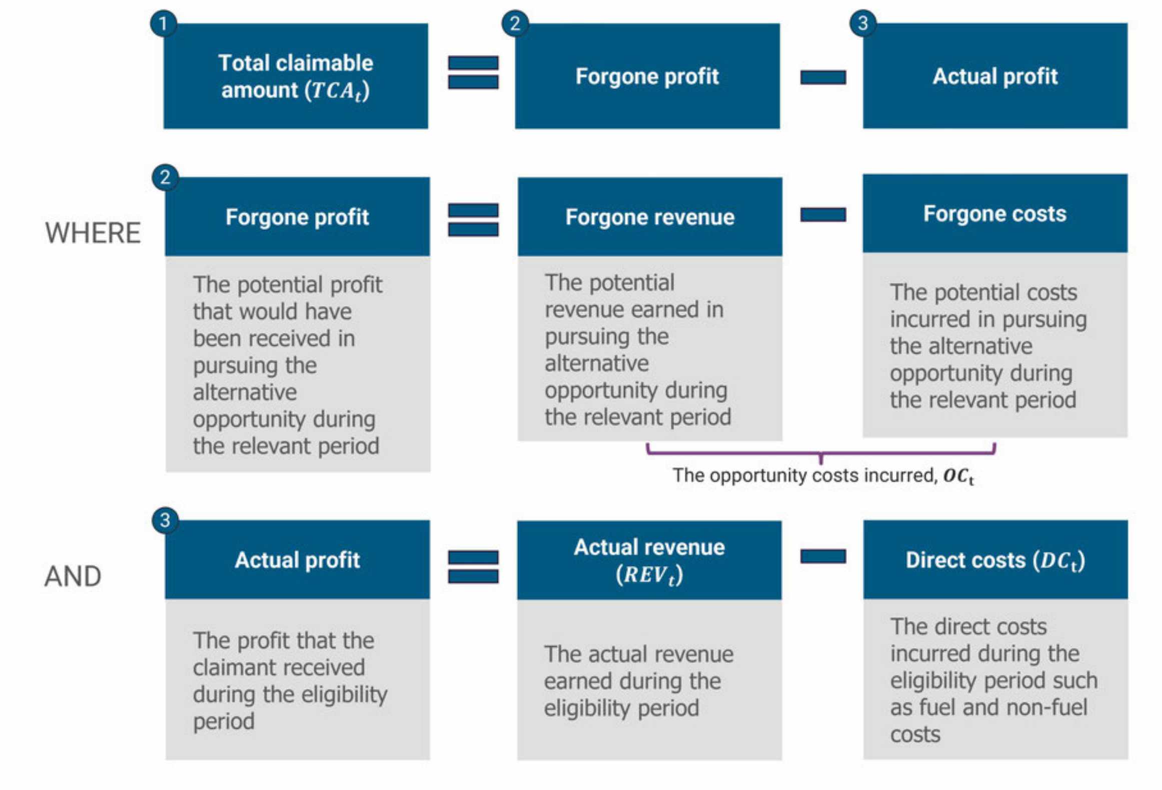
Source: AEMC guidelines, 2021, Figure 5.1.

Where:

- *TCA* = Total Claimable Amount.
- *DCt* = Direct costs incurred in the eligibility period(s).
- *OCt* = Opportunity costs incurred over the relevant period of time.
- *REVt* = Actual or potential revenue.
- *OTHt* = Any other adjustments to the amount of compensation payable to be taken into consideration by the Commission.
- *t* = relevant period of time for which a claim is being made. The claimant is to define the time period(s) for which it is making a claim for compensation, which should be limited to periods where the price limit event applies. The relevant time period may vary depending on the type of claim. The AEMC would assess whether the claimant has demonstrated the requirements for a claim in the relevant time period(s).

Figure 2.2 sets out a diagrammatic demonstration of how this equation can be applied to an opportunity costs claim, and the information required from claimants to calculate the TCA.

Figure 2.2: Calculation of the total claimable amount



Source: AEMC, 2024.
Note: In line with the TCA formula, other adjustments (OTH_t) to the amount of compensation payable, such as subtraction of other forms of compensation received, may be taken into consideration by the Commission.

The *value of the forgone opportunity*, i.e., the opportunity costs variable, *OCt*, is the potential profit that would have been received if the claimant had pursued the alternative opportunity during the relevant period. It is calculated as the forgone revenue associated with the alternative opportunity (in the period of time and market in which the opportunity lies), less the costs that would have been incurred had the claimant pursued its alternative opportunity.

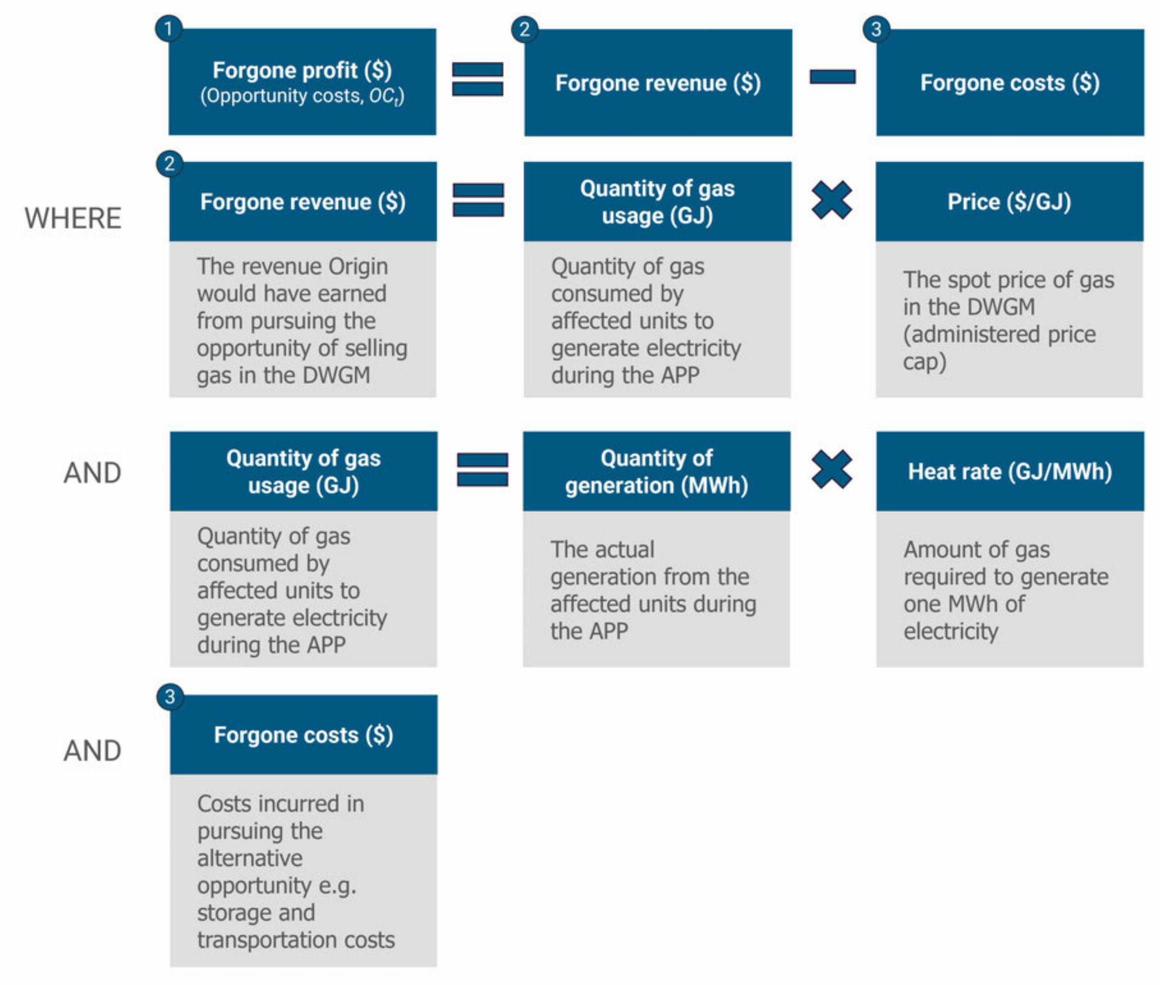
The forgone revenue associated with the alternative opportunity should reflect the quantity of resource sold multiplied by the price of the resource:

- The *quantity* component constitutes the quantum of generation that the claimant supplied to the NEM during the APP that is above what it would have preferred to supply, during the application of the APC.
- The *price* component is the price at which that quantum of generation is valued for the relevant period in which the forgone opportunity would have occurred.

2.2.2 Valuation of Origin's opportunity costs

Figure 2.3 shows the Commission's valuation methodology to determine the value of Origin's forgone profit (*OCt* in the equation presented in Figure 2.1 above).

Figure 2.3: Commission's proposed valuation methodology for Origin



Source: AEMC, 2024.

The Commission agrees with Origin on the quantity of gas consumed by its generation units that applies to its forgone opportunity

With respect to the *quantity* component of revenue, the Commission's view is that Origin's determination of the quantity of gas consumed by the generation units that applies to its forgone opportunity is appropriate. Origin's claim assumes that no gas would have been used to supply into the electricity market in its alternative opportunity. The Commission is satisfied that it was technically possible for Origin to divert the gas used to generate during the APP into the DWGM.

The Commission agrees with Origin on the price that applies to its forgone opportunity

With respect to the *price* component of revenue, the Commission's view is that Origin's determination of the gas price that applies to its forgone opportunity is appropriate.

The Commission is satisfied that it was possible for Origin to sell the volume of gas in question into the DWGM over the relevant period, and to achieve the price of $40/GJ for the gas. Origin has provided evidence in its submission to the DOCM that its sell prices for the supply of gas into the DWGM during the relevant period were generally set at or above the administered price cap.

In addition, the Commission is satisfied that an injection of the quantity of gas that is the subject of this claim over multiple trading days would have been unlikely to have altered market outcomes materially in the DWGM such that the prices reduced below the APC of $40/GJ.

The Commission has taken into account the costs incurred when taking advantage of the alternative opportunity

In its DOCM, the Commission noted that to accurately reflect the change in profit that would have arisen in taking advantage of the alternative opportunity, an estimate of the costs incurred in realising the alternative opportunity is required.

Origin has not submitted estimates of additional costs associated with the forgone opportunity or the direct costs it incurred during the eligibility period. However, it has submitted that any forgone costs (for example, gas storage and transportation) are minimal and likely to be exceeded by any direct costs from the eligibility period, which it has not included in the claim. The Commission has considered the rationale and information provided by Origin and is satisfied that this assumption is reasonable. This is based on the assumption set out in the DOCM that the costs of purchasing gas (i.e. separate to storage and transport costs) are equal between the eligibility and relevant periods, and information provided by Origin that transport and storage costs associated with pursuing the forgone opportunity are less than those direct costs incurred in the eligibility period.

The Commission is satisfied that adopting the assumption that forgone costs are either equal to or less than direct costs is conservative (in that, if those costs were not equal, Origin's claim would most likely be understated rather than overstated as Origin is not claiming any amount for additional direct costs) and that a detailed investigation of these cost components is not necessary.

For the alternative opportunity proposed by Origin, the Commission has therefore set forgone costs to be equal to direct costs for the purpose of the calculation of the TCA.

The effect of the Commission's conclusions is that the formula to be applied for the purposes of the TCA is simplified to forgone revenue less actual revenue, noting the need to also deduct compensation amounts already paid (this is discussed further in section 3.5.2 below).

2.2.3 The Commission's approach is a market-based approach consistent with the hierarchy of principles outlined in the Guidelines

Origin's proposed methodology values opportunity costs by taking the quantity and cost of the gas consumed at its gas generation units and assuming that this gas would have been sold at a higher value in the DWGM at the same time or at a later date (at prices that actually prevailed in the DWGM at that time). The scenario is based on its ability to store gas and sell this gas into the DWGM at the same time or at a later date.

The valuation methodology proposed by Origin represents a market-based valuation in accordance with the hierarchy of principles outlined in section 5.3.4 of the Guidelines.

2.2.4 The Commission's approach aligns with the objective of the compensation scheme

The Commission seeks to apply a transparent approach, to the extent possible and where appropriate to the claim, to its assessment of claims for opportunity costs. We consider that this supports the stated objective[26] of the administered pricing compensation framework, which is to maintain the incentive for market participants to provide services during a price limit event.

26 Clause 3.14.6(c) of the NER.

Specifically, the approach adopted by the Commission is a market-based approach that utilises publicly available data to the extent possible and relies on a DWGM price, which was transparent to the market during the APP.

The Commission notes that all administered pricing compensation claims are assessed on their individual merits, and decisions on one claim do not necessarily mean that the Commission will decide in the same way on another claim.

2.3 We have considered stakeholders' views in assessing Origin's claim

In making this final decision, the Commission has considered stakeholder feedback through submissions to the DOCM published on 27 June 2024,[27] and Origin's submission in response to our draft decision.

The Commission received submissions on the DOCM pertaining to Origin's opportunity cost claim, from Origin and AGL Energy Limited (AGL):

- Origin agreed with the Commission's premise that an injection of the quantity of gas that is the subject of this claim over multiple trading days would have been unlikely to have altered market outcomes materially in the DWGM resulting in prices below the APC of $40/GJ. Origin also provided supplementary information in response to the further evidence sought by the Commission in the DOCM, including:
    - evidence to demonstrate that the claimed alternative opportunity is consistent with Origin's observed market behaviour.
    - an overview of Origin's risk management/governance framework to demonstrate that its gas trading systems and governance arrangements could have enabled or permitted it to take advantage of such an opportunity.
    - evidence from relevant business areas that it could access gas, transportation and storage rights to be able to take advantage of the alternative opportunity.
    - additional commentary related to direct costs incurred during the eligibility period, and costs Origin would have incurred in pursuing the alternative opportunity, such as costs relating to the transportation and storage of gas. Origin submits that it would not have incurred any material costs of this nature in pursuing the alternative opportunity.
- AGL noted that it considers the Commission's assessment to be appropriate. However, it has noted that the Commission should consider whether the claimant had the ability to supply gas into the relevant injection points for the DWGM to evidence that the alternative opportunity was a real opportunity forgone. AGL recommended the Commission consider whether the claimant's offers into the DWGM demonstrated that it would have taken advantage of the opportunity.

In relation to the points raised by AGL, the Commission is satisfied on the basis of the information provided by Origin (including further information specifically sought from and provided by Origin in response to the draft decision) that it had the ability to supply gas into the DWGM during the period of the forgone opportunity for the reasons discussed above. The Commission is also satisfied that Origin's bidding behaviour into the DWGM indicates that the forgone opportunity would likely have been realised.

27 Clause 3.14.6 (o) of the NER.

3 The Commission's determination of the quantum of compensation

3.1 Origin's eligibility to claim compensation for individual eligibility periods

Under the NER and Guidelines, a claimant is eligible for compensation in an eligibility period if it is an eligible party and has incurred total costs during the eligibility period that exceed the total revenue it received from the spot market during that period.[28]

An eligibility period is the period starting at the beginning of the first trading interval in which the price limit event occurs in a trading day and ending at the end of that trading day (i.e. at 4:00am on the following day).[29] The table below details the relevant eligibility periods to determine compensation claims under clause 3.14.6 of the NER.

Table 3.1: Eligibility periods for determining claims for compensation

Trading day	Queensland	New South Wales	South Australia	Victoria
12 June 2022	From 6:55pm to end of trading day	-	-	-
13 June 2022	Entire trading day	From 6:35pm to end of trading day	From 10:00pm to end of trading day	From 10:05pm to end of trading day
14 June 2022	Entire trading day	Entire trading day	Entire trading day	Entire trading day
15 June 2022	Entire trading day	Entire trading day	Entire trading day	Entire trading day

Note: All specified times are in Eastern Standard Time.

Although Origin's claim is for the eligibility periods from 4.05am on 14 June 2022 and ceasing 4.00am on 16 June 2022, each trading day (or part of a trading day) within this period is a separate eligibility period for the purposes of this claim.[30] This is because the Commission is required by clause 3.14.6(b) of the NER to consider Origin's eligibility based on total costs and total revenue over each entire eligibility period.

3.1.1 Origin is eligible to claim compensation for 14 and 15 June 2022

The table below presents the calculation of Origin's net position, equal to total costs less total revenues over each eligibility period. A claimant is only eligible in an eligibility period where its net position is a loss (shown by a positive number in the *Net position* column in the table).

Table 3.2: Calculation of net position to assess eligibility

Eligibility period	Opportunity costs* (+)	Direct costs (+)	Spot market revenue (-)	Other adjustments (-)	Net position (=)
14 June 2022 (entire trading day)	[redacted] *less forgone costs*	*Assumed to be equal to forgone costs*	[redacted]		[redacted]

28 Clause 3.14.6(b) of the NER.

29 Clause 3.14.6(a) of the NER.

30 Clause 3.14.6(a) of the NER. See also definition of 'trading day' in Chapter 10 of the NER.

Eligibility period	Opportunity costs* (+)	Direct costs (+)	Spot market revenue (-)	Other adjustments (-)	Net position (=)
15 June 2022 (entire trading day)	[redacted] *less forgone costs*	*Assumed to be equal to forgone costs*	[redacted]	[redacted]	[redacted]

Source: AEMC, based information provided by Origin and AEMO. *Opportunity costs are as calculated by the AEMC.

Note: A positive net position indicates the claimant made a loss, while a negative net position indicates the claimant made a profit. A different net position could arise if opportunity costs were calculated using a different valuation methodology.

The Commission has determined Origin is eligible to claim compensation in respect of its scheduled generating units during the APP for the trading days of 14 and 15 June 2022. When all relevant costs and revenues are included, Origin made a net loss during the eligibility periods commencing on 14 and 15 June 2022 for the generating units that are the subject of the claim.

3.2 Calculation of opportunity costs

The amount at which Origin has valued its opportunity costs is [redacted]. This is different to its total claimable amount, which is [redacted] once relevant revenues are accounted for.

The Commission has reviewed the information provided by Origin and verified this information with AEMO against market data where available.

The Commission has determined the opportunity costs to be [redacted] less forgone costs, calculated as set out in the table below. This has been calculated applying the Commission's methodology outlined in Figure 2.3 above. As discussed above, the Commission has assumed that forgone costs are equal to direct costs, so it is not necessary to quantify these for the purposes of applying the TCA formula.

Table 3.3: Calculation of forgone revenue by unit

DUID	Component	14/06/2022	15/06/2022	Sub-total
Uranquinty	Quantity (GJ)	[redacted]	[redacted]	[redacted]
	Forgone revenue ($)	[redacted]	[redacted]	[redacted]
Quarantine	Quantity (GJ)	[redacted]	[redacted]	[redacted]
	Forgone revenue ($)	[redacted]	[redacted]	[redacted]
Mortlake	Quantity (GJ)	[redacted]	[redacted]	[redacted]
	Forgone revenue ($)	[redacted]	[redacted]	[redacted]
Totals	Quantity (GJ)	[redacted]	[redacted]	[redacted]
	Forgone revenue ($)	[redacted]	[redacted]	[redacted]

Source: AEMC, based on information provided by Origin and AEMO.

Note: Forgone costs have not been included in the table above as the Commission has assumed that these costs are equal to direct costs and do not have a net impact on the TCA.

3.3 Calculation of direct costs

In accordance with the Guidelines and the calculation of the TCA, the Commission has considered the amount of direct costs incurred during the relevant eligibility period(s) from Origin's claim.

Origin has not claimed compensation for direct costs.

In response to the DOCM, Origin confirmed that it does not claim for direct costs incurred as part of its claim, as it is difficult to accurately attribute and quantify material costs of the nature outlined in the Guidelines to the operation of the relevant generating units during the eligibility period. However, as outlined in section 2.2.2 above, Origin noted it did incur direct costs in transporting gas to the relevant generating units during the eligibility period, and that these costs were larger than any comparable costs that would have been incurred in relation to pursuing the alternative opportunity.

As noted above, the Commission has adopted the conservative assumption that forgone costs are equal to direct costs for this claim. It is therefore not necessary to reach a determination on direct costs because these costs cancel each other out for the purposes of applying the TCA formula.

3.4 Calculation of actual or potential revenue

In accordance with the Guidelines, the Commission has deducted the amount of actual revenue (including spot market revenue) earned during the relevant eligibility period(s) from Origin's claim.[31]

Origin has provided information on its spot market revenue during the application of the APC in the administered price period. AEMO has also provided details of the spot market revenue that Origin has received in respect of the period over which the claim for compensation has been made.

The Commission has calculated the actual revenue to be [redacted], based on the information provided by Origin on its spot market revenue during the application of the APC in the APP.

3.5 Other adjustments

3.5.1 Financing costs

In accordance with the Guidelines, the Commission may recognise reasonable financing costs with respect to the time between the event occurring and any compensation being awarded. The Commission may also have regard to the timing of relevant revenues had the compensation events not occurred. In determining such costs, the Commission can also take into account any unreasonable delays from the claimant in providing the necessary information. The Commission assesses any financing costs on a case-by-case basis.[32]

Origin has not made a claim for financing costs.

3.5.2 Other sources of compensation

In determining the amount of compensation payable, the Commission may take into account the value of any other sources of compensation paid, to be paid, or under consideration to be paid, to the claimant where that compensation arises out of the same events and covers the same costs that are the subject of this compensation claim.[33]

31 Section 5.1.4 of the Guidelines.

32 Section 5.1.5 of the Guidelines.

33 Section 5.1.5 of the Guidelines.

Origin received directions compensation from AEMO under NER Clause 3.15.7, Payment to Directed Participants. Origin was subject to directions from AEMO in the periods outlined in the table below.

Table 3.4: Origin's directed periods

Generating unit	Start time	End time
Uranquinty Power Station Unit 11	14/06/2022 08:30	15/06/2022 14:00
Uranquinty Power Station Unit 12	14/06/2022 08:30	15/06/2022 14:00
Uranquinty Power Station Unit 13	14/06/2022 08:30	15/06/2022 14:00
Uranquinty Power Station Unit 14	14/06/2022 08:30	15/06/2022 14:00
Quarantine Power Station Unit 5	14/06/2022 11:25	15/06/2022 14:00
Mortlake Power Station Unit 11	15/06/2022 14:25	15/06/2022 22:30
Mortlake Power Station Unit 12	15/06/2022 15:55	15/06/2022 22:30

AEMO has verified and provided to the Commission the directions compensation Origin received for each of the generating units during the periods above.

This directions compensation has been captured as an 'other adjustment' to the amount of compensation payable and deducted from the total claimable amount as it effectively represents additional revenue earned by Origin in respect of the power generated during the APP that it would not have earned if it had pursued the alternative opportunity.

The Commission has deducted [redacted] from the total claimable amount, based on the information provided by AEMO regarding directions compensation paid to Origin for the same units.

3.6 Total amount of compensation

The Commission has determined Origin is eligible to be paid compensation by AEMO

The Commission has determined that:

- Origin is eligible to claim compensation in respect of its gas-powered power stations Uranquinty (NSW) Units 11 to 14, Quarantine (SA) Unit 5, and Mortlake (Victoria) Units 11 and 12 during the APP for the trading days commencing on 14 June and 15 June 2022 as it has demonstrated it had incurred a net loss on these trading days.
- Origin notified the AEMC and AEMO of its intention to claim compensation in accordance with clause 3.14.6(h) and (i) of the NER.
- The information provided by Origin to support and substantiate its claim complies with the Guidelines.
- The opportunity costs claimed by Origin are consistent with the definition of opportunity costs outlined in the Guidelines:
  - Origin has demonstrated that its plant had scarce capacity or resources as a result of a relevant limitation, consistent with the Guidelines.
  - Origin has demonstrated that it was prevented from using that scarce capacity or resources more profitably at a later point due to the imposition of a price cap during a price limit event.

- The Commission has calculated the value of the more profitable alternative opportunity using a market-based approach that compensates for any profit forgone as a result of continuing to supply or consume energy or services during the price limit event.

Origin is entitled to receive total compensation of $4,882,360.98 (exclusive of GST) in respect of its claim

The total amount of compensation (*TCA*) for this opportunity cost claim is calculated in accordance with the formula set out in Figure 2.1.

The Commission has determined Origin's TCA as follows:

- opportunity costs incurred in the relevant period(s) in the amount of [redacted] minus forgone costs, noting that the Commission has made the assumption that forgone costs are equal to direct costs and so have no net impact on the calculation of the TCA
- plus direct costs, which are assumed to be equal to forgone costs
- minus actual revenue from the eligibility period in the amount of [redacted]
- minus directions compensation paid of [redacted].

The Commission will write to AEMO to advise of the total amount of compensation payable for each relevant eligibility period by trading interval, exclusive of GST. AEMO will then recover the cost of compensation from market customers who purchased energy from the spot market in the relevant eligibility periods in the cost recovery region(s).[34]

The NER provides the process and formulae for AEMO to recover the compensation payable from market customers in the cost recovery region(s).[35]

Clause 3.15.10(c) of the NER also requires AEMO to include in preliminary and final settlement statements separate details of any compensation amounts payable by or to market participants within 25 business days of AEMO being notified by the AEMC that compensation is to be paid under clause 3.14.6 of the NER.

3.7 Recovery of the AEMC's costs

Consistent with clause 3.14.6(v) of the NER, the AEMC will recover costs incurred by the AEMC in carrying out its functions in respect of assessing Origin's opportunity cost claim.

The costs to be recovered from Origin in respect of its claim:

- include costs incurred by the AEMC in engaging external contractors to support the claim assessment
- exclude AEMC staff costs and staff on-costs (such as payroll, utilities, hardware) incurred in assessing Origin's claim
- exclude costs that are not directly attributable to Origin's claim; for example, external contractor costs for advice relating to opportunity cost claims in general.

The Commission will advise Origin of the costs to be recovered from Origin under clause 3.14.6(v) of the NER following publication of this decision.

Further information on the recovery of the Commission's costs is provided in **Appendix B**.

34 Clause 3.15.10 of the NER.

35 Clause 3.15.10 of the NER.

Abbreviations and defined terms

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
APC	Administered price cap
APP	Administered price period
Commission	See AEMC
DOCM	Draft opportunity cost methodology
DWGM	Declared Wholesale Gas Market
Guidelines	Final guidelines for administered pricing compensation
NEM	National Electricity Market
NER	National Electricity Rules
Origin	Origin Energy Electricity Limited
TCA	Total claimable amount

A Background

Wholesale spot prices in the National Electricity Market (NEM) can vary within a range of between minus $1,000 per MWh[36] and $15,500 per MWh.[37]

Persistent high or low prices can create risks for participants and impact the stability of the market. To limit this variation, at times of extreme prices where the cumulative price threshold (CPT)[38] is exceeded, the administered price cap of $600 per MWh and the administered floor price of -$600 per MWh is applied to spot prices.[39]

At the time of the June 2022 market events to which this claim for compensation relates:

- the MPC was $15,100/MWh[40]
- the CPT was $1,359,100; and[41]
- the APC was $300/MWh.[42]

A.1 Administered pricing compensation

The NER under clause 3.14.6 and the AEMC compensation guidelines (Guidelines) (published by the Commission under clause 3.14.6(e) of the NER) set out a process for market participants to claim compensation for certain losses incurred during an administered pricing period where the APC or administered floor price is applied.

The purpose of administered pricing compensation is to minimise disincentives during administered price periods

The potential for market participants such as generators, particularly those with high costs, to incur a loss during these administered price periods may create a disincentive for them to supply energy and ancillary services, which could in turn have a negative impact on the security and reliability of the electricity system.

To minimise these disincentives, the NER allow participants to claim administered pricing compensation if they incur a loss during price limit events, being periods in which the spot price is set by the APC during an administered price period.[43] The Commission administers this compensation process. Prior to June 2022, there has only been one claim for compensation arising from an administered price period, which occurred in January/February 2009.[44]

36 This amount is the 'market floor price' under clause 3.9.6(b) of the NER.

37 This amount is the 'market price cap' (MPC) under clause 3.9.4 of the NER. Under clause 3.9.4(d) of the NER, the MPC must be adjusted in line with the consumer price index each year. At the time of the market events occurring in June 2022, the MPC was $15,100/MWh. As of 1 July 2022, the MPC is $15,500/MWh.

38 The CPT represents the limit of aggregate dispatch prices over a period of seven days (2,016 trading intervals). Under clause 3.14.1(e) of the NER, the CPT must be adjusted in line with the consumer price index each year. At the time of the market events occurring in June 2022, the CPT was $1,359,100. As of 1 July 2022, the CPT is now set at $1,398,100.

39 Clauses 3.14.1 and 11.155.2 of the NER.

40 Under clause 3.9.4(d) of the NER, the MPC must be adjusted in line with the consumer price index each year. As of 1 July 2024, the MPC is $17,500/MWh.

41 Under clause 3.14.1(e) of the NER, the CPT must be adjusted in line with the consumer price index each year. As of 1 July 2024, the CPT is $1,573, 700/MWh.

42 As a result of making the National Electricity Amendment (Amending the administered price cap) Rule 2022, the administered price cap is $600/MWh on and from 1 December 2022 until the end of 30 June 2025.

43 See clause 3.14.6 of the NER. A price limit event also includes where the spot price for a trading interval is set as a result of price scaling (i.e. the application of clause 3.14.2(e)(2)), and for market participants in respect of scheduled load where the spot price for a trading interval is set by the administered floor price or the result of price scaling (under clause 3.14.2(e)(4)), for scheduled network service providers the spot price for a trading interval for a region towards which it is transporting power is set by the APC or price scaling, and for ancillary service providers where the ancillary service price for a trading interval is set by the APC during an administered price period.

44 AEMC 2010, Compensation claim from Synergen Power Pty Ltd, Final decision, 8 September 2010. https://www.aemc.gov.au/markets-reviews-advice/compensation-claim-from-synergen-power

A.2 Market events in June 2022

On 12 June 2022, the cumulative price threshold (CPT) was exceeded for the Qld region and the APC of $300/MWh was applied under clause 3.14.2(d1) of the NER from 6:55pm on that day. Price scaling applied to the other mainland National Electricity Market (NEM) regions when energy was flowing towards Qld. On 13 June 2022, the CPT was exceeded in the NSW, Victoria (Vic) and South Australia (SA) regions (from 6:35pm in NSW, 10:00pm in SA and 10:05pm in Vic). The APC of $300/MWh was therefore applied in each mainland NEM region.

The APC application in those regions coincided with reductions in the amount of generation bid into the market, resulting in a requirement for AEMO to intervene to maintain system reliability. At 2:05pm on 15 June 2022, AEMO determined that it was necessary to suspend the spot market in all regions of the NEM under clause 3.14.3 of the NER. During this period of market suspension, spot prices were no longer set by the APC but rather, were set in accordance with the market suspension pricing schedule published by AEMO. On 22 June 2022, AEMO released its criteria and process for lifting the market suspension.

APPs officially ended when the CPT was no longer exceeded. In SA, this occurred on 22 June 2022 and in NSW, Qld and Vic, this occurred on 23 June 2022. Normal dispatch pricing resumed on 23 June 2022. The market suspension was formally lifted by AEMO in all regions from 2:00pm on 24 June 2022.

B Administered pricing compensation process

Eligibility to claim for compensation

Parties eligible to make a claim for administered pricing compensation are:

- Scheduled Generators, Non-Scheduled Generators and Scheduled Network Service Providers to supply energy,
- Ancillary Service Providers to supply ancillary services,
- Market Participants with scheduled loads to consume energy, and
- Demand Response Service Providers to supply wholesale demand response.

These parties can claim compensation if they supplied energy or other services during an administered pricing period and incurred a net loss. That is, their direct and/or opportunity costs exceeded their total revenue from the spot market over an entire "eligibility period" (the period from the first trading interval of a trading day where the spot price is set by the administered price cap, until the end of that trading day). There may be multiple eligibility periods within an administered price period.

Direct costs are costs directly incurred by eligible participants due to a price limit event.

Opportunity costs are the value of opportunities forgone by eligible participants due to the price limit event as defined in the Guidelines.

Making a claim

The Guidelines set out how participants can make a claim for compensation for direct costs and opportunity costs following the application of an APC. The AEMC is required to apply the Guidelines in assessing claims for compensation unless it is satisfied there are compelling reasons not to do so.

If a party decides to make a claim, the following applies:

- The claimant must provide notification in writing that it is making a claim within five business days of notification by AEMO of the end of the APP to both:
  - AEMC at applications@aemc.gov.au
  - AEMO at NEMIntervention@aemo.com.au
- This notification in writing will include the:
  - APP and price limit event.[45]
  - Region(s) in which the APP and price limit event applied.
- The notification will state whether the claim is a direct cost claim or a claim that includes opportunity costs.
- It is possible to claim direct costs and opportunity costs for the same price limit event.

Commencing formal assessment of a claim

- After receiving the notification to make a claim, the AEMC will publish a notice of receipt. The AEMC will then seek information from the claimant that we consider required to enable assessment of the claim - if the claim includes opportunity costs, this information must include the methodology used by the claimant to determine its opportunity costs.

45 Price limit events(s) refer to a period in which the spot price is set by the APC during an APP or as a result of price scaling.

- The claimant subsequently provides substantiation. The onus is on the claimant to provide evidence and justification. There is no set time period for this step. Any claims of confidentiality in respect of information provided by the claimant to the AEMC must be specified in the claim.
- The AEMC will commence formal assessment as soon as practicable after receiving sufficient information from the claimant.
- A notice will be published on the AEMC website that formal assessment has started.

Assessing and making a final decision with respect to a claim

- The assessment process for direct and opportunity costs is set out in the Guidelines. Claims will be assessed in accordance with the statutory timeframes.
- For **direct cost claims**, the following key steps apply:
    - Commencement of formal assessment (once sufficient information is received from claimant – see above)
    - Assessment of claim
    - Consultation with claimant
    - Final determination of compensation payable (45 business days after formal commencement)
    - AEMC notifies AEMO of final amount payable
    - AEMO includes details of amounts payable by or to market participants within 25 days of being notified by the AEMC
- For **opportunity cost claims**, the following key steps apply:
    - Commencement of formal assessment (once sufficient information is received from claimant see above)
    - Assessment of claim
    - Publish claimant's proposed methodology and AEMC's draft methodology for public consultation (within 35 business days of formal commencement)
    - Close of consultation (minimum of 20 business days after publication of draft methodology)
    - Final determination of compensation payable (35 business days after close of submissions)
    - AEMC notifies AEMO of final amount payable
    - AEMO includes details of amounts payable by or to market participants within 25 days of being notified by the AEMC

Recovery of the Commission's costs of claim

The Commission may recover from a claimant any costs incurred by the AEMC in carrying out its functions in respect of its claim.[46] The AEMC may require the claimant to pay all or a proportion of those costs to the AEMC prior to the claim being considered or determined.

The Commission will exercise its discretion in deciding whether to recover processing and administrative costs from the claimant and will assess any costs to be recovered from a claimant on a case-by-case basis.

46 Clause 3.14.6(v) of the NER.

The Commission has decided to recover costs incurred by the AEMC in engaging external contractors to support its functions in respect of assessing opportunity costs claims made in relation to the June 2022 APP.

Costs will be recovered from opportunity cost claims that proceed to formal commencement, with the cost recovery amount being calculated once the claim is closed, whether that is through the AEMC issuing a final decision or the claimant withdrawing its claim.

The Commission has decided at this stage not to recover costs from claimants for direct cost claims made in relation to the June 2022 APP.

C Chronology of the compensation assessment process

Table C.1 sets out the timing of Origin's compensation assessment process.

Table C.1: Chronology of Origin's compensation assessment process

Date	Event
22 June 2022, 29 June 2022	Notice of claim received
6 September 2023	Supporting information received
16 May 2024	Formal assessment commenced
27 June 2024	Draft opportunity cost methodology published
26 July 2024	Close of submissions on the draft opportunity cost methodology
15 August 2024	Draft decision provided to Origin
15 August – 22 August 2024	Consultation with the claimant on the draft decision
12 September 2024	Final decision published