



7 November 2024

Anna Collyer
Chair
AEMC

Submitted online: www.aemc.gov.au

Dear Ms Collyer,

Better integration of gas and community sentiment into the ISP – Draft rule determination

Origin Energy Limited (Origin) welcomes the opportunity to comment on the AEMC's draft rule determination on the 'Better integration of gas and community sentiment into the ISP'. Origin broadly supports the amendments aimed at facilitating more comprehensive gas analysis within the Integrated System Plan (ISP) and enabling the development of a more accurate and reliable electricity optimal development path (ODP).

Additionally, Origin agrees with the AEMC's decision not to introduce specific amendments regarding the integration of community sentiment within the ISP, given existing National Electricity Rules (NER) already provide the flexibility for AEMO to further consider community sentiment and request relevant information from Transmission Network Service Providers (TNSPs).

Below, we provide additional comments on some specific aspects of the draft amendments.

Protection of commercially sensitive and confidential gas information

Origin strongly supports the confidentiality provisions in the draft rule to mitigate the risk of commercially sensitive and confidential information being disclosed. The protection of confidential information is important to market confidence, cost stability and pricing outcomes. The focus on confidentiality directly addresses stakeholder concerns and is consistent with the national energy objectives (NEO and NGO) by enhancing market confidence and promoting efficient investment in and use of electricity and natural gas services for the long-term interests of consumers.

Gas information consistency across AEMO publications

Consistency in the gas development projections and gas information published by AEMO across various publications would offer stakeholders greater clarity and improve the efficiency and reliability of analysis. To further support the consistency of published gas information beyond the draft rule, guidelines such as the ISP and Gas Statement of Opportunities (GSOO) methodologies should be reviewed and updated to align approaches to gas analysis and modelling where appropriate.

In instances where discrepancies in the published gas information still arise, Origin supports the draft rule requirement for AEMO to identify and explain the reasons for these differences, promoting transparency and minimising potential confusion.

If you wish to discuss any aspect of this submission further, please contact me at Megan.Findlay@originenergy.com.au or by phone, on +61 434 934 793.

A handwritten signature in black ink, appearing to read "S. Derby".

Sarah-Jane Derby
Senior Manager, Regulatory Policy