



17 July 2014

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

**Re: National Gas Amendment (Portfolio Rights Trading Rule) 2014 – Draft Rule Determination**

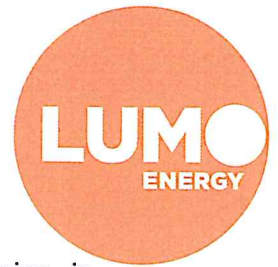
Lumo Energy welcomes the opportunity to comment on the Australian Energy Market Commission's (AEMC) Draft Rule Determination in relation to the National Gas Amendment (Portfolio Rights Trading) Rule 2014.

Lumo Energy is 100% owned by Infratil Limited, a company listed on the New Zealand and Australian Stock exchanges. We sell gas and electricity in New South Wales and electricity in South Australia and Queensland. We are currently one of the largest second tier retailers.

The AEMC released a Draft Rule Determination in response to this rule proposal following the release of its Consultation Paper. After considering the range of substantive issues related to this rule proposal, the AEMC has decided to proceed with the rule proposal submitted by AEMO.

Lumo Energy supports the Draft Rule Determination made by the AEMC. Consistent with our original submission to the AEMC's Consultation Paper, our view is the Draft Rule Determination is consistent with the National Gas Objective (NGO). This is because we consider Draft Rule will:

- provide a net benefit to the market by promoting more efficient utilisation of existing pipeline capacity deferring the need for more costly augmentations of the Declared Wholesale Transmission System (DWTS);
- promote competition in the DWGM by providing smaller market participants like us and other new entrants with a mechanism to access AMDQ and AMDQcc;
- improves the ability of market participants to manage their market risk;
- improves the transparency of the trading arrangements relating to AMDQ & AMDQcc.



Lumo Energy thanks the AEMC for the opportunity to make a submission in response to the Draft Rule Determination. For any enquiries regarding this submission, please contact Con Noutso Wholesale Regulatory Manager at Lumo Energy on 03- 9976 5701.

Yours sincerely

A handwritten signature in blue ink, appearing to read "J. Mulder".

**Justin Mulder**  
General Manager Wholesale  
**Lumo Energy Australia Pty Ltd**