

A few
words.



12 January 2017

John Pierce
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Submitted online via www.aemc.gov.au

Reference GRC0036

Dear Mr Pierce,

Gas Day Harmonisation Draft Rule Determination

AGL welcomes the opportunity to comment on the Australian Energy Market Commission (AEMC) Draft Rule Determination on the National Gas Amendment (Gas day harmonisation) Rule 2016.

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator and developer of renewable generation. Our diverse power generation portfolio includes base, peaking and intermediate generation plants, spread across traditional generation fuel sources as well as renewable sources. AGL is also a significant energy retailer, providing energy solutions to over 3.7 million customers throughout eastern Australia.

AGL supports the AEMC's proposal to implement a harmonised gas day across the East Coast gas markets. Additionally, the AEMC's Draft Rule 541(2), ensuring alignment in the GSH Exchange Agreement, is a positive measure, wholly supported by AGL.

The AEMC's Draft Rule Determination recognises that a transitional period will be required to implement gas day harmonisation. As a gas shipper, AGL's GTAs and GSAs will require amendment. Furthermore, as an operator of gas storage facilities, AGL will be required to change internal systems, metering and operating procedures. AGL's submission to the AEMC Consultation Paper outlined that the costs of such changes are not expected to be material; however the changes will take time.

AGL considers that the AEMC's proposed commencement date of 1 April 2021 is more than sufficient. However, AGL requests that market participants be given sufficient time to participate in, and respond to, consultation by AEMO on procedure changes and amendments to STTM rules that will come about as a result of



harmonisation. AGL considers participants should be given a number of months to make necessary changes to systems and processes arising from changes to AEMO procedures, prior to gas day harmonisation commencing.

If you have any queries about the submission or require further information, please contact Liz Gharghori at lgharghori@agl.com.au or on 03 8633 6723.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux', is positioned below the text 'Yours sincerely,'.

Simon Camroux
Manager Wholesale Markets Regulation