



Review of the Victorian Declared Wholesale Gas Market  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

Via email: [aemc@aemc.gov.au](mailto:aemc@aemc.gov.au)

11 May 2017

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### **Submission: Assessment of Alternative Market Designs Discussion Paper**

Jemena welcomes the opportunity to provide a submission to the Assessment of Alternative Market Designs Discussion Paper (the **Paper**), as part of the Australian Energy Market Commission's (the **AEMC**) ongoing review into the Victorian Declared Wholesale Gas Market (the **DWGM**).

Jemena owns and operates a diverse \$9 billion portfolio of energy and water transportation assets across the east coast of Australia. This includes a regulated electricity distribution network which serves 320,000 customers in north west Melbourne, as well as part ownership of the United Energy and ActewAGL electricity distribution networks. We also own gas distribution and transmission assets throughout eastern and northern Australia.

Jemena considers the proposal in the Paper to establish a gas trading platform at Longford (similar to the platforms in place at Wallumbilla and Moomba) represents a practical and cost-effective solution to improving trading within the DWGM, and would align with the broader east coast gas market design and reform. While Jemena supports this option presented by the AEMC, there are other options presented in the Paper that Jemena has significant concerns regarding the potential impacts, and practicalities, of implementation, not just within Victoria but also for other Australian jurisdictions and from a national perspective.

In responding to the Paper, Jemena has limited its commentary to Options 3.4 and 4.2 which are likely to directly impact Jemena's assets and/or have a material impact on the National Gas Objective. As previously noted, Jemena has significant concerns on the potential impacts of other options presented in the Paper. However, given Jemena's limited role within the DWGM, we feel that other market participants will be better placed to comment in detail on these matters.

Please contact Benjy Lee (03 9173 9874 or [Benjy.lee@jemena.com.au](mailto:Benjy.lee@jemena.com.au)) if you would like to discuss our submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Shaun Reardon", with a long horizontal flourish extending to the right.

Shaun Reardon  
Executive General Manager—Customer & Markets