

14 January 2016

Christiaan Zuur  
Senior Advisor  
Australian Energy Markets Commission  
Submitted via AEMC website – ERC0181

Dear Christiaan,

**RE: Multiple Trading Relationships Draft Determination**

Stanwell welcomes the opportunity to provide comment on the Multiple Trading Relationships (MTR) Draft Determination (Draft Determination).

Stanwell notes that the original MTR proposal was subject to a cost benefit analysis which showed that it was not in the long term interests of consumers. The current rule change proposal is the outcome of a COAG request for *AEMO to develop a rule change request for MTR that incorporated alternative, more cost effective options while preserving the policy intent of the initial high level design framework*<sup>1</sup>.

Stanwell supports the Commission's decision not to progress the proposed rule change. We agree with the Commission's statement that

*Implementing the rule change request is unlikely to deliver material benefits for most customers but is likely to impose significant costs on market participants, which may in turn result in increased electricity retail prices for all customers.*<sup>2</sup>

Stanwell also supports the Commission's decision not to progress consideration of the "single meter model" through a More Preferable Rule Change. We agree that development of this model is more appropriately carried out by the proponents outside the current rule change process.

We look forward to the Commission applying equivalent rigour in 2016 to other rule change proposals which in previous iterations have been found to have costs exceeding the possible benefits.

If you would like to discuss any aspect of this submission, please contact me on 07 3228 4529.

Regards

**Luke Van Boeckel**  
**Manager Regulatory Strategy**  
**Energy Trading and Commercial Strategy**

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<sup>1</sup> Draft Determination, page 6

<sup>2</sup> Draft Determination, executive summary