



29 September 2011

Mr John Pierce  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Mr Pierce

**GRC0010 - STTM Market Schedule Variation Rule change**

Origin Energy Limited (Origin) welcomes the opportunity to comment on the Australian Energy Market Operator's (AEMO's) Rule change request in relation to a Market Schedule Variation (MSV) in the STTM.

We support the Rule change request to both extend the MSV window from four days to seven days and move the operational aspects relating to the timing of MSVs from the National Gas Rules (NGR) and into the STTM Procedures.

Origin considers that a seven day MSV trading window can promote more efficient decision making by market participants. The extended trading window enables STTM participants to make informed decisions using better quality and more stable data. This can improve trading participants' confidence in the MSV market, potentially increasing the liquidity of MSVs.

We also support moving the operational aspects relating to the timing of MSVs from the NGR into the STTM Procedures. Having that detail in the STTM Procedures allows for greater flexibility for pursuing other operational improvements. In addition, AEMO's Procedure change and consultation processes are robust enough to provide sufficient certainty and predictability for STTM participants.

Given AEMO's well-established Procedure change process, Origin does not consider it necessary to set parameters in the NGR that limit the scope of changes to the MSV transaction window, such as imposing minimum or maximum MSV transaction windows. Retaining parameters in the Rules negates the flexibility benefits from moving those specifics into the STTM Procedures.

If you have any questions or would like to discuss this submission further, please call Hannah Heath (Manager, Regulatory Policy) on (02) 8345 5500.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Phil Moody". The signature is fluid and cursive, with the first name being more prominent.

Phil Moody  
Group Manager - Commercial, Analysis and Risk Services  
Energy Risk Management