

30 March 2016

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

Dear Mr Pierce

RE: GRC0036 – GAS DAY HARMONISATION RULE CHANGE REQUEST

The Australian Petroleum Production & Exploration Association (APPEA) is the peak national body representing Australia's oil and gas exploration and production industry. APPEA has around 70 full member companies exploring for and producing Australia's oil and gas resources. These companies currently account for around 98 per cent of Australia's total oil and gas production and the vast majority of exploration. APPEA also represents over 170 associate member companies providing a wide range of goods and services to the industry.

APPEA welcomes the opportunity to provide comments on the gas day harmonisation rule change request. APPEA's comments should be read in conjunction with individual submissions from our member companies.

Industry continues to support harmonising the gas day across markets to encourage more efficient trading and further development of liquidity.

APPEA's members indicate that implementation costs to harmonise the gas day start time will include letter agreements to vary the definition of Day in Gas Sales Agreements (GSAs) and Gas Transportation Agreements (GTAs), and changes to systems such as metering, process history database, billing and accounting.

We look forward to working with the AEMC to progress this initiative. Please contact Adam Welch, Senior Policy Adviser, at awelch@appea.com.au or 08 9426 7205, to discuss any aspect of APPEA's submission.

Yours sincerely



Damian Dwyer
Director – Economics