

Alice

I apologise to messing up the appointment we agreed – mea culpa – to discuss the proposed DWGM rule changes to the maintenance planning.

As we discussed, we have no objections to having this rule expedited, as I agree that the in the main there is little controversy about the proposals.

We think that rule changes 2 and 3 are sensible and should be implemented by

- Changing the definition of DWGM facility operators to include producers, storage providers and service providers
- Removing the definition of producer and storage providers from the NGR and making the definition of these as laid out in the NGL

With regarding the standard for system security, we think that, while the proposed change reflects the reality of what occurs now, there needs to be some controls on how AEMO exercises its “reasonableness” when minimising the threat to security of supply. To address this, we suggest that AEMO should assess the cost of minimising the threat to the security of supply and if this value is greater than the cost to consumers of losing supply, then the actions for minimising the threat should not be taken.

Please accept this as the MEU submission to this proposed rule change

Regards

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