

A few
words.



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Yvonne Tan
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Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3001

Submitted via email gwcf_correspondence@aemo.com.au

Reference STTM IIR 16-001

Dear Ms Tan,

Short Term Trading Market Procedures

AGL welcomes the opportunity to comment on the Australian Energy Market Operator's (AEMO) proposed changes to the Short Term Trading Market Procedures (STTM Procedures).

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator and developer of renewable generation, providing energy solutions to over 3.7 million customers throughout eastern Australia.

AGL supports the proposed changes to clause 9.4.1 of the STTM Procedures, clarifying that non-registered price steps within a contingency gas (CG) offer or bid must be confirmed. AGL considers these changes will help to simplify what is currently a complicated process.

AGL considers that removing the requirement to identify the party that informed AEMO of a CG trigger event is not a positive change for the STTM. While AGL acknowledges the concerns AEMO has outlined around the possible disclosure of confidential information, AGL is concerned that the proposed change will lead to an increase in CG assessment conferences.

During a CG event, the open and transparent flow of information is key to ensuring an appropriate outcome. AGL considers that this openness prevents speculation and uncertainty developing amongst market participants and as such, cautions against the proposed changes to clause 9.3.2.

If you have any queries about the submission or require further information, please contact Liz Gharghori at lgharghori@agl.com.au or on 03 8633 6723.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux'.

Simon Camroux
Manager Wholesale Markets Regulation