



27 October 2023

Reform Development and Insights  
Australian Energy Market Operator

Submitted by email: [reformdevelopmentandinsights@aemo.com.au](mailto:reformdevelopmentandinsights@aemo.com.au)

### **Structure of Gas Participant Fees Draft Determination**

Origin Energy welcomes the opportunity to provide comments on the Structure of Gas Participant Fees Draft Determination.

We are generally supportive of the fee structures proposed by the Australian Energy Market Operator (AEMO). In response to the Consultation Paper, Origin supported the first option proposed to recover the cost of the East Coast Gas System (ECGS) Reform Program, which would introduce a fee consistent with the Gas Bulletin Board (GBB) fee structure and allocate costs across producers and wholesale market participant withdrawals on an 50/50 basis. AEMO has now proposed an alternate third option in the Draft Determination which would apportion costs consistent with the Gas Statement of Opportunities (GSOO) fee structure (i.e. on a 30 and 70 per cent basis across producers and retailers respectively). In adopting this option, AEMO should ensure the change in cost allocation better satisfies the reflective of involvement principle relative to the GBB approach.

Please don't hesitate to contact Ben Hayward on 03 9067 3403 to discuss this submission or related issues.

Yours Sincerely,

A handwritten signature in black ink that reads "S Cole".

Shaun Cole  
Group Manager, Regulatory Policy