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4 February 2021

Mr Kevin Ly
Group Manager Regulation
Australian Energy Market Operator
Level 2, 20 Bond Street
SYDNEY NSW 2001

Submitted via email

Dear Mr Ly,

Re: Gas Fee Structures Draft Report and Determination

Red Energy and Lumo Energy (Red and Lumo) welcome the opportunity to provide feedback to the Australian Energy Market Operator (AEMO) on the gas fee structure draft report and determination.

Consumers must be at the centre of all of AEMO's decision making as fees levied by AEMO are directly accounted for in retail pricing and ultimately borne by consumers. Consistent with all participants in the gas market, AEMO must strive to ensure that all fees charged are efficient with a constant focus on ensuring that the lowest costs are passed on to consumers. Red and Lumo support the draft determination made by AEMO.

Operational ease of implementation

Red and Lumo propose that AEMO should publish an easy to understand spreadsheet which clearly outlines the breakdown of the fees that will be charged to participants. A template of this should be published by AEMO on the website and remain consistent throughout the 5 year period with any changes outside of this period kept to an absolute minimum as required to accommodate any new fees.

Red and Lumo thank AEMO for the opportunity to respond to this consultation. Should you wish to discuss aspects or have any further enquiries regarding this submission, please call Stephen White, Regulatory Manager on 0404 819 143.

Yours sincerely

Ramy Soussou
General Manager Regulatory Affairs & Stakeholder Relations
Red Energy Pty Ltd
Lumo Energy (Australia) Pty Ltd