



21 October 2024

Australian Energy Market Operator

Submitted via email: GWCF_Correspondence@aemo.com.au

Consultation on Approved Process changes

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Operator's (AEMO) consultation on Approved Process changes. We have provided comments on the proposed changes below.

Engagement with Consultative Forums

Origin understands the amendment to Clause 4(a) is likely intended to facilitate a more efficient procedural change process where appropriate (e.g. in circumstances where changes are largely administrative in nature). While we are notionally supportive of that objective, we consider consultative forums to be an effective channel for identifying and discussing upcoming procedural amendments to ensure any impacts are fully understood by all parties, including AEMO. Removing this engagement requirement reduces transparency and creates a risk that unintended consequences may not be identified until a later stage in the consultation process, which can increase complexity, particularly if it necessitates a change in approach.

On this basis, it would be prudent to retain an obligation to bring any proposal for the making of procedures to the relevant consultative forum (e.g. Gas Wholesale Consultative Forum), even if only for noting to support transparency. Where this is not achieved, we recommend revising Clause 4(a) to ensure any procedures that could be considered material are required to be brought to the relevant consultative forum. For consistency, AEMO could utilise the definition outlined under Clause 135EF(2)(b) of the National Gas Rules (NGR) and treat material as any change that could have significant financial or operational impact on market participants. Importantly, this approach would also ensure market participants have an opportunity to provide their view on the appropriateness of a proposed procedure following the ordinary or expedited change process prior to an Impact and Implementation Report (IIR) being released.

Inclusion of a significant changes summary in Impact and IIR

Origin supports the inclusion of a summary of any significant changes that are being made to an existing procedure as part of any IIR, as described under Clause 5(d). This will assist stakeholders in reviewing the materiality of procedural changes and their potential impacts.

If you wish to discuss any aspect of this submission further, please contact Liz Robertson at Liz.Robertson@originenergy.com.au.

Yours Sincerely,

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

Shaun Cole
Group Manager, Regulatory Policy