

27 May 2025

Australian Energy Market Operator (AEMO)

Via email: reformdevelopmentandinsights@aemo.com.au.

NEM Participant fee structures

Alinta Energy welcomes the opportunity to provide feedback on the consultation paper regarding the AEMO's proposed NEM participant fee structures as applied from 1 July 2026.

Fee structure period¹

We propose the period during which the Participant fee structure should apply be kept to five years. Whilst we understand AEMO's contention that seven years would provide greater certainty and predictability to participants; we believe the current pace of reform is increasing at such a rate that it warrants more frequent review of the participant fee structure to ensure it is fit for purpose. A five-year duration, as has applied in each of the past four determinations, achieves a reasonable balance.

Inclusion of DNSPs and Metering Coordinators (MCs)²

We recommend that DNSP's and Metering Coordinators are included in AEMO's fees structure.

Noting the increasing involvement of both DNSPs and MCs in AEMO's activities and outputs, we consider that continuing to exclude these participants from the structure would be inconsistent with the following principles.

As noted by AEMO³, the fee structure principles outline:

- the requirement for fees to **reflect the extent of participants' involvement in the particular output**, in consideration of the degree to which participants: interact with AEMO in relation to the output; use the output; receive the output; and benefit from the output.
 - It has been noted by AEMO that this principle is akin to the "economic notion of user pays".
- **avoiding discrimination between participants** through providing reasonableness and equality in their application:
 - "Discriminate means to treat people or categories of people differently or unequally. Discriminate also means to treat people, who are different in a material manner, in the same or identical fashion. Further, "discriminate against" has a legal meaning which is to accord "different treatment ... to persons or things by reference to considerations which are irrelevant to the object to be attained". This principle allows AEMO to discriminate against a

¹ 4.5 in the Consultation paper.

² 4.2.2 in the Consultation paper.

³ A1 in the Consultation paper.

category or categories of Registered participants where to do so would be reasonable”.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this further, please get in touch with Isidora Stefanovic at isidora.stefanovic@alintaenergy.com.au.

Yours sincerely,

Oscar Carlberg
National Regulatory Affairs Manager