



19 March 2019

John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online: www.aemc.gov.au

Dear Mr Pierce

Northern Territory Emergency Gas Supply Arrangements – Consultation Paper

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the Australian Energy Market Commission's (AEMC) Consultation Paper on Northern Territory Emergency Gas Supply Arrangements.

Origin generally supports the consistent application of reporting requirements to ensure a level-playing field for all parties. However, we recognise the NT liquefied natural gas (LNG) facilities currently have a relatively unique relationship with the domestic market that may warrant alternate treatment. Information on the upstream activities of these projects could conceivably provide some benefits (e.g. it could potentially inform future commercial and investment decisions). At this point in time however, these benefits are likely to be outweighed by the associated costs.

The AEMC's proposed assessment framework is appropriately defined to consider these issues, but it is also important consideration is given to the period over which any exemption provided to the NT LNG facilities should apply. With the recent completion of the Northern Gas Pipeline (NGP) and potential for future resource development, market conditions in the NT may change over time such that the exemption is no longer appropriate (e.g. the NT LNG projects are interacting more heavily with the domestic market). This issue can be addressed by ensuring any exemption is reassessed periodically to account for any material change in circumstances. Further, as suggested in the Consultation Paper, it would be beneficial to require reporting of changes in the availability of gas under emergency agreements to ensure relevant information is disclosed to the domestic market where appropriate.

If you wish to discuss any aspect of this submission further, please contact Shaun Cole at shaun.cole@originenergy.com.au or on 03 8665 7366.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Reid".

Steve Reid
Group Manager, Regulatory Policy