



12 September 2019

John Pierce
Chairman
Australian Energy Market Commission

Lodged online: www.aemc.gov.au

Dear Mr Pierce

AEMC: DRAFT DETERMINATION OF TRANSPARENCY OF NEW PROJECTS RULE CHANGES

Origin Energy Limited (Origin) welcomes the opportunity to provide comments on the AEMC's Draft Determination. We agree with the intent of the draft rule to provide clearer information to participants on new entrants to the market. We also agree with the intent of providing clearer market information to project developers that do not intend to become registered participants.

Introducing a formal requirement on AEMO to maintain the Generation Information Page is an appropriate way of ensuring that the market is informed of changes to existing generators and in-development projects. However, we consider that the publication of new project information at the connection enquiry stage is too early in the process, given that:

- Connection enquiries are often used to evaluate a proposal with many projects not proceeding beyond this stage of the connection process. Publishing project information on connection enquires could therefore be of limited usefulness and runs the risk of being misleading.
- The publishing of projection information at this stage could reveal commercially sensitive information. For example, project proponents could still be in negotiations with landowners or planning authorities at this stage of the process. Publication of project information could result in other parties attempting to procure the proposed site before negotiations are concluded.

We recommend that AEMO publish details on the generation information page only once projects advance to the connection application stage. We support AEMO publishing de-identified aggregate details of connection enquiries received within each region, which will inform stakeholders of the level of interest of new entrants.

Origin Energy considers that the proposed changes to provide NEM information to project developers are appropriate. We also support AEMO conducting annual reviews of the participant list, to ensure developers do not receive NEM information after they no longer need it.

Should you have any questions or wish to discuss this submission further, please contact Alex Fattal via email alex.fattal@originenergy.com.au or phone, on (02) 9375 5640.

Yours sincerely

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

Steve Reid
Group Manager, Regulatory Policy