AEMC

ECGS Supplier of last resort mechanism

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

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PROJECT DETAILS

NAME OF RULE CHANGE [OR REVIEW]:	**ECGS Supplier of last resort mechanism**
PROJECT CODE:	GRC0077
PROPONENT [DELETE IF NOT APPLICABLE]:	Energy Senior Officials/Victorian Minister for Energy and Resources
SUBMISSION DUE DATE:	30 October 2025

CHAPTER 2 – DEFINING THE PROBLEM

1. Defining the problem	
1. Do you agree that these are problems to be addressed by this rule change process?	Yes

CHAPTER 3 – POLICY OPTIONS FOR A PROPOSED SOLR MECHANISM

2. Policy options	
1. What do you consider to be the best policy option outlined? Why?	Option 3A GBE is of the view that the SoLR mechanism needs to be implemented soonest and that seeking to link supply and demand mechanisms will complicate the process and delay implementation. GBE believe that a supply mechanism will be easier and quicker to implement. In relation to Option 2A, whilst peak demand will largely occur in winter, there are potential circumstances where issues such as the failure of coal fired power generator, an extended drought or a wind drought may impact other seasons. As such Option 2B (and subsequently 3A referred to above) are better suited to a supply side SoLR. Conceptually demand side options are attractive but practically they have been difficult to implement at any scale. Demand side lends itself more to bona fide emergency management when on a day there is insufficient supply in the market and the market is suspended, and Emergency Shutdown tables are implemented as per the Victorian DWGM.
2. Are there other potential benefits and costs of the policy options identified?	See above.
3. Are there any variations to the policy options outlined that would better address the problem?	

CHAPTER 4 – KEY DESIGN FEATURES OF A SOLAR MECHANISM

3. Principles to guide AEMO's use of a SoLR mechanism	
1. Should there be principles to guide AEMO's use of a SoLR mechanism?	Yes
2. What is the appropriate set of principles for the SoLR mechanism? Why?	The proposed principles for the use of SoLR: • actions taken should be least distortionary • actions maximise the effectiveness of the SoLR reserve at least cost to consumers • amount payable should not exceed the estimated value of gas customer reliability (VGCR) are appropriate. In addition, GBE would give consideration to the following:

	• industry should be given a reasonable time to address a risk or threat as market driven solutions are preferable to interventions. The implication above is that given time the industry would address the issue itself. This would be correct if the market drivers provided an incentive to address supply and security of supply, but it is GBE's view that the market is not providing the appropriate signals and until the issue is addressed, a need for SoLR exists. If industry has no driver to pursue this principle, the issue it will remain unaddressed. This is also a principle of the ECGS. As highlighted below, GBE also agrees with the following principles: • In all circumstance, safety should not be compromised. • Distortionary impacts should be minimised. • Average capital exposure (rather than amount payable) by AEMO for SoLR should not exceed the average VCR for the region. Comment: A VCR needs to be established and agreed by industry and the public that recognises a prudent level of supply security, acknowledging that no amount of investment can guarantee supply. GBE would use the term capital exposure rather than "amount payable". Depending on the SoLR mechanism employed, AEMO may well be holding an asset (eg gas in the ground). How the gas is utilised may have an impact on its inherent value such that it may be greater than its original cost. Gas purchased at low prices (eg off peak market purchases or via a tender mechanism) may be sold into a higher priced market to maintain supply to the market. Rent will be captured from parties that require SoLR as a result of managing their portfolio or exposing themselves to market risk in an unreasonable or negligent manner.
3. Should these principles be mandatory or part of AEMO's broader discretion?	The principles should be mandatory, but discretion needs to be given to AEMO where the market is demonstrably not providing the desired and market participants can't or won't intervene.
4. Do you have any views on how any principles should complement other more prescriptive obligations in the NGR or the ECGS Procedures?	Principles to guide AEMO's use of the ECGS trading function that may want to be considered in the SoLR principles (some of which are a repeat of the above) include: • appropriate market structure is identified and required changes addressed to alleviate the problem • industry given a reasonable time to address a risk or threat • distortionary impacts on the ECGS and costs to industry and consumers are minimised • do not compromise safety

	For the sake of consistency and completeness, GBE also consider the principles to guide AEMO's use of the RERT. GBE would highlight the following as appropriate considerations with regards to SoLR: • reasonable actions taken to have least distortionary effect on market operations • maximise effectiveness of reserve contracts at least cost to end use consumers. Efforts to create consistency across rules and procedures would be encouraged.
4. Services AEMO could procure through a SoLR mechanism	
1. Should the NGR identify particular types of SoLR reserves AEMO could access? If so, what types of reserves?	AEMO should seek the most flexible services capable of meeting all likely scenarios. To this end GBE suggests that the services AEMO would procure through a SoLR mechanism would most likely be limited to a storage SoLR reserve due to its greater flexibility. In this case gas is placed in storage and used where required to address a threat to reliability and supply adequacy. As per question 2.3, GBE agree that demand response services should be considered, and they are not mutually exclusive to the key service outlined above but experience suggests their role will be limited. In any case, GBE is of the view that generally AEMO would limit itself to services already available to the market i.e. the procurement of uncommitted gas and then placement of this gas into unsold capacity held by storage providers or pipelines. Only in extraordinary circumstances, in events of clear market failure and where a lack of market signals had failed in developing required infrastructure would GBE support direct investment in infrastructure. In this case the investment should be made alongside changes to the market with the intent that the investment is an interim solution seen as a means of transitioning back to market supported services.
2. Which matters regarding the types of SoLR reserves are best left to the ECGS Procedures?	Whilst AEMO may seek to meet specific requirements, those facilities that provide maximum flexibility to deal with the largest range of circumstances should be prioritised. Market efficiency and optimisation should be taken into account. ECGS procedures should reflect this position. ECGS procedures need to recognise that whilst shortfall events may be forecast years in advance, non-forecastable but possible events such as facility failures or significant seasonal events may lead to short term market disruption where the

	market is already tight. It would be preferable that any SoLR service be capable of meeting a range of outcomes.
5. Constraining AEMO's SoLR costs	
1. What are the interim and ongoing metrics that should be applied to constrain the amount AEMO pays when using the SoLR mechanism? Why?	In an energy market that is focusing on electrification, gas will have an ongoing role as a primary source of energy but increasingly its role will be to ensure the security of supply into the power market. A VGCR is a good benchmark but increasingly, the value of gas will reflect its value to the power market. The Victorian DWGM market price cap is set at $800/GJ. The maximum price in the power market is currently $17,500/MW. Assuming a heating factor of 10GJ/MW, the gas price equivalent is $1,750/GJ. Recognising the differing trading periods (5 minutes with 30 minute average price in the power market versus a minimum 4 hours in the DWGM) the current market price cap for gas in the Victorian DWGM would be appropriate to apply to the constraints to the amount AEMO pays when using SoLR. In GBE's view, potential exposure to high prices is meant to motivate parties to prudently operate in the market and encourage parties to invest in appropriate supply and delivery capacity. If AEMO is to assume that parties should be exposed to these prices during market shortages, AEMO should be prepared to use the market price cap as the basis for its analysis. As flagged in previous comments, GBE's view is that the market structure is currently not providing the desired outcomes, leading to a need for the SoLR. Recognition and exposure to the true value of gas is currently artificially constrained by the Cumulative Price Threshold mechanism that should either be removed from the market or the trigger for the mechanism raised considerably.
6. Geographic and seasonal scope for a SoLR mechanism	
1. What is the relevant geographic scope for SoLR mechanism?	With the interconnected nature of the market, events in one part of the market can impact the entire market. It is acknowledged that there may be some transmission constraints that may separate markets but flexible SoLR solutions such as underground gas storage can alleviate these constraints, allowing shipping and storing of gas during off peak periods for use during peak periods where constraints may arise. Further, whilst current market scenarios anticipate a shortage of gas in the southern jurisdictions of the ECGM, a series of outages of coal fired power generation could lead to extensive use of gas fired power generation in northern jurisdictions. This leads to constraints across the entire market (north or south – the energy may ship by pipe or wire in this circumstance) and there may be an inability to ship gas south due to the gas being utilised in the north. A SoLR in the southern market would still impact on events outside of its immediate locale.

	GBE is of the view that the whole ECGS should have access to the SoLR.
2. Should a SoLR mechanism only be used for threats over winter or should it be available at any time of the year?	GBE believes that the SoLR should be available at any time of the year given shortfalls may be event driven rather than capable of being forecast.

CHAPTER 5 – PRECONDITIONS AND TRIGGERS

7. Existing preconditions and triggers for AEMO intervention	
1. Do the existing NGL and NGR preconditions and trigger for the trading function lack transparency and clarity? Is this a significant issue? Why?	The preconditions are satisfactory. GBE agree with an explicit reliability standard. This should refer to both peak day and seasonal (yearly) supply. There is currently too much emphasis on yearly forecasting and limited consideration of peak day ability to deliver and near term events that could create a shortfall. High gas prices should not be a driving factor. This is the market indicating that more supply is needed and any dampening of this trigger (such as the Cumulative Price Threshold) only increase the need for SoLR.
8. Using risk or threat signalling framework as a precondition	
1. Do you consider that a risk or threat signalling framework that uses tiers and a probabilistic metric would be a useful and relevant precondition for AEMO to decide whether to establish a SoLR reserve?	Current forecasting suggests that SoLR is required in the near term due to lack of industry investment. It should be contemplated immediately. SoLR needs to be robust for long term planning scenarios and realistic short term events. Whilst the imminent need is currently forecast in 2029+, reasonably conceivable events could trigger a shortfall much earlier. Once the market has been modified and sufficient investment is being provided by industry it would be appropriate to revisit the need for a signalling framework.
2. If a tiered risk or threat signalling framework was used, what tiers and probabilities would be appropriate signals for making decisions on using a SoLR mechanism?	The market is at least at the high end of AEMC's proposed mechanism now. Action on SoLR needs to be immediate. Conceptually, GBE believes that the term Emergency should be reserved for when there is an actual shortfall or it is imminent. Level 3 could be renamed "Critical" or similar. The Probability ranges are somewhat qualitative – the upstream industry uses 10%, 50% and 90% as its benchmarks.

	GBE would propose 1. Early Warning 5 -10% Probability of not meeting Demand 2. Alert 10 – 50% Probability of not meeting Demand 3. Critical 50 - 90% Probability of not meeting Demand Emergency > 90% Probability of not meeting Demand or Actual Shortfall in the coming year Consideration should be given to timing and period of the shortfalls and having a separate tiered risk structure for short term (day) events, medium (one to two weeks) and longer term (seasonal). Whilst a shortfall of supply may be forecast in say 2029, it may still be reasonable that the shutdown of a coal fired power station for a period may trigger a shortfall event in the near term for a period of time.
1. Would a tiered system of shortfall risk provide a clear signal to the market about when AEMO would consider whether to intervene?	It would be a useful tool recognising that events can escalate immediately to higher levels with demand side (e.g. increased use of gas for gpg due to unplanned coal fired power generation outages) or supply side events (e.g. failure of gas production or transmission assets)
9. Operational factors could form part of a trigger	
1. To what extent should the preconditions for a SoLR mechanism include operational factors? Why?	Operational events indicate near term issues. If the supply (capacity) is not already installed, then a SoLR would not make any difference as there is no capacity to call on. This reflects GBE's previous statements. • Currently there is a lack of appropriate capacity/infrastructure in the supply chain due to supressed market signals. • SoLR is required now to manage near term / operational factors whilst restructuring the market so that the market can deal with longer term/forecast issues. • If the market is not restructured, SoLR will need to be relied upon indefinitely.
2. What operational conditions should be part of the trigger for a SoLR mechanism?	The operational specifics will need to be defined system by system: • The longer term and immediate triggers need to be differentiated. • On any day it is simply pressure (demand greater than supply). This could be a simple lack of supply or an event impacting the supply of gas • On a forward basis it is reliant on forecast These are both consistent with NGR Rule 440 as per 5.3.1 of the Consultation Paper.

3. Are there any other factors or information that could provide greater transparency and predictability about how and when a SoLR mechanism could be triggered?	
10. AEMO's discretion under a trigger mechanism	
1. To what extent should AEMO retain some discretion as part of the trigger for SoLR? Why?	In circumstances when an unanticipated event impacts supply (or dramatically increases demand) AEMO should have some discretion to respond to the specifics of the event. For forecast events, AEMO should have limited discretion as the process will be better defined as per the proposed trigger mechanisms.
11. The trigger for contingency gas in the STTM	
1. Should the trigger to use contingency gas in the STTM be separate and mutually exclusive from a SoLR mechanism in the ECGS? Why?	No, the triggers should be consistent across all markets and mechanisms. There needs to be a differentiation of immediate and near term events that are not forecastable but can be anticipated. In a market where gas supply forecasts are balanced in the market and long term supply and demand seem appropriately matched, it may still be fitting to have some form of SoLR in place (if the market is unwilling to provide) to deal with anticipated events not directly related to gas supply (eg excessive use of gpg due to wind/water drought or producer facility failure).
2. Are there any issues the AEMC should consider if an STTM contingency gas mechanism and an ECGS SoLR mechanism are to co-exist?	
3. Is guidance required (in the NGR or procedures) on the order of priority of market intervention tools? How much discretion should be provided to AEMO in its decisions on what tools to use?	Yes, guidance is required as different issues may require a range of solutions. AEMO should have available and the market should understand the potential options to address a variety of market issues.
12. The trigger for intervening in the DWGM	
1. Should the trigger to intervene for system security reasons in the DWGM be amended if a SoLR mechanism for reliability and supply	It should be AEMO's aim (possibly a stated principle) to maintain the integrity of the market price setting mechanism until it is inevitable that the market physically cannot meet demand i.e. supply will not meet demand in any one gas trading period.

adequacy threats is introduced for the ECGS? Why?	At a point where no amount of money will permit supply to meet demand (or it is inevitable that this will occur) the market can be suspended and an "Emergency" declared. This circumstance assumes all SoLR demand side opportunities have been exhausted (assuming there are any commercial demand side responses available to AEMO) and then demand side consequences are likely to occur (i.e. involuntary load shedding). An Administered Price should only be put in place whilst an Emergency is underway. The mechanism for a Cumulative Price Threshold triggering an Administered Price should be removed or at a bare minimum, the trigger made significantly higher.
2. Should the trigger for AEMO to use the Dandenong LNG storage facility be amended if a SoLR mechanism for the ECGS is introduced? Why?	Generally, GBE's submission is in line with the existing Dandenong Facility rules. Where there are changes that would be inconsistent, the Dandenong Facility rules should be updated. GBE does not see the need for a differentiated mechanism at Dandenong.
3. Are there any issues the AEMC should consider if the DWGM intervention powers and an ECGS SoLR mechanism are to co-exist?	See above

CHAPTER 6 – OPERATING A SOLR MECHANISM

13. Key steps in operating a SoLR mechanism	
1. Do stakeholders see any additional steps not identified in the consultation paper that should be included in AEMO's use of a SoLR mechanism (if introduced)?	These steps are appropriate
2. Does the operational sequence outlined in the consultation paper align with stakeholder expectations of how AEMO would use a SoLR mechanism?	Yes
14. Arrangements to transport gas to address a reliability threat	
1. Drawing on the issues and scenarios above, how do you think AEMO would acquire, transport	Accessing capacity should not be an issue in the DWGM given market participants (essentially) don't hold capacity rights in their own right but simply utilise the system as per the market rules.

and pay for gas through a SoLR mechanism?	In contract carriage markets (STTM), it would be unusual for parties who have a supply imbalance to not seek capacity in their own right unless there is market failure – this would also apply to uncontracted supply and gas storage capacity (See Section 4 Question 1). In the case of market failure AEMO would need to purchase capacity, either on the day or over the period of constraint. If there is insufficient capacity in place (i.e. all capacity is contracted) AEMO would need to underwrite an expansion (if that were the only option available). This would be an even greater example of market failure and require immediate remediation. Payment should be via the ongoing operation of both the DWGM and STTM such that parties who are short in the market (contracted insufficient supply, transmission or peaking capacity) would be exposed to the prices in the imbalance markets. If the market is appropriately modified, commercial parties should be motivated to contract for the positions that AEMO was forced to take under the SoLR.
2. To what extent should intermediaries be involved in transporting gas procured under the SoLR mechanism? Why?	In the case of market failure, the lowest cost solution should be pursued. If intermediaries (brokers) can reduce costs, they should be utilised. If changes need to be made to the market (either DWGM or STTM), AEMO should hold the positions until the market drivers motivate the commercial entities to take over those positions.
3. Would using AEMO's directions power be appropriate for transporting gas procured under the SoLR mechanism? Why?	The whole motivation in markets (such as the DWGM and the STTM) is to reward the parties who do the right thing and maintain the integrity of the system via sound wholesale gas portfolio management. This includes supporting the development of suitable infrastructure in the appropriate timeframe. If a party is long supply/capacity, it should be entitled to take advantage of this position. AEMO should only manage the shortfalls. Parties with excess capacity should not be directed to allow other parties to utilise that capacity unless it is at a market price that represents the value of that supply/capacity on that day. This presumes no anti-competitive behaviour has been taking place such as hoarding of capacity.
15. Conditions required to enter or vary reserve contracts	
1. What requirements should be in place to enable AEMO to enter	GBE is aligned with the proposed approach.

into and vary contract conditions for a SoLR mechanism?	
2. Is publishing a reserve establishment notice a sufficient precondition for AEMO to enter into or vary a contract using a SoLR mechanism?	If the preconditions and triggers are acceptable to the market, the establishment notice should be a sufficient precondition.
16. How to relinquish capacity and transfer gas from a SoLR storage reserve	
1. To reduce risks of crowding out, should the NGR specify a mandatory, discretionary or hybrid approach to the relinquishment of capacity and transfer of gas for SoLR storage reserves?	GBE supports the approach that if commercial entities choose to purchase otherwise uncontracted capacity from the service provider (currently held by AEMO), then it is mandatory the capacity should be relinquished back to the service provider so that the services can be sold to the commercial entity. Any gas held in storage associated with the relinquished capacity should be offered for sale by AEMO to all comers on a commercial basis at market prices.
2. Which type of approach balances the need to minimise market distortion while supporting reliability and cost-effective outcomes for consumers?	GBE supports a stricter relinquishment process whereby capacity is given up by AEMO when market participants are prepared to pay and utilise the capacity held by AEMO.
17. Buying and selling gas through facilitated markets	
1. Should a SoLR mechanism include requirements that AEMO bid to buy and offer to sell gas in the facilitated markets at the relevant market price cap?	No. If AEMO has entered the market for the purposes of SoLR, it is apparent that the market requires that supply. The only reason that AEMO is in the market is due to market failure. If the market had not failed, then presumably commercial entities would be in the market broadly seeking to provide the same services. As closely as possible AEMO should seek to purchase gas in the same manner as a commercial entity – purchasing gas for storage on low price days. To the extent this increases the price of gas on any one day, the same outcome probably would have occurred if a commercial entity had entered the market. GBE supports a process that allows AEMO to act as a market participant seeking to purchase gas at the lowest possible price – this tends to align with a broker with a defined strategy entering the market on AEMO's behalf.
2. Should a SoLR mechanism include requirements regarding how AEMO buys and	See above.

sells gas through the GSH and DAA? If so, is it appropriate to require AEMO to use a broker, or should additional or different requirements be imposed?	
3. What, if any, requirements should be in place for AEMO buying and selling gas outside the DWGM, STTM, GSH or DAA?	See above

CHAPTER 7 – ADMINISTERED DEMAND RESPONSE

18. Role of demand response in gas market arrangements	
1. How responsive are gas users to price given underlying bilateral contracts or GSAs? What are the barriers to gas users reducing consumption based on higher prices?	General Statement on Demand Response: conceptually GBE supports this approach. Historically there has been limited response to demand side management that is not triggered by emergency procedures. We suspect this will not be a key component of any SoLR proposal.
2. How do current market arrangements across the ECGS (both the facilitated markets and outside of those markets) enable gas users to reduce demand to meet supply? For example, in the STTM, how effective are MOS, MSV, and contingency gas arrangements in this respect?	
3. What are the barriers to reducing consumption using existing gas market arrangements?	
19. Using flexible demand to address supply shortfalls	
1. How much capacity could be made available through an administered demand response mechanism implemented across the ECGS?	
2. Does the potential amount of responsive	

demand vary between jurisdictions or is it evenly distributed across the ECGS?	
3. Does the potential amount of responsive demand vary between seasons?	
20. Factors that may impact demand response participation	
1. What are the factors that could impact gas users' ability to participate in an administered demand response mechanism?	
2. What impact would the terms of gas supply and transport agreements have on gas users' ability to participate in an administered demand response mechanism? Would these contracts require amending to enable participation in demand response mechanism?	
3. Would an availability fee help overcome some barriers and enable greater participation in an administered demand response mechanism?	
4. Would an alternative approach of making demand response-relevant information available to AEMO enable it to make informed decisions that support a demand response in the ECGS?	
21. Potential designs for an administered demand response mechanism	
1. In reference to the outlined design options in Table 7.1, what potential design options could be successful for an ECGS administered	

demand response mechanism? Why?	
2. Are there other design options the AEMC could consider?	

CHAPTER 8 – COST RECOVERY AND PROCEEDS DISTRIBUTION

22. Removing the trading fund and its $35 million cap	
1. Should the trading fund:	
A. be retained as is	No
B. be retained in an amended form, and if so, what amendments should be made, or	No
C. be removed and replaced with a cost recovery and proceeds distribution mechanism as proposed?	Yes
23. Triggering the cost recovery and proceeds distribution process	
1. Do you consider that the appropriate trigger for using the cost recovery and proceeds distribution process is when AEMO establishes a SoLR reserve? Is there a more preferable alternative?	Yes. Funds should only be sought from the market once the need for a SoLR mechanism has been triggered and the scope known.
2. Should guidance on using the cost recovery and proceeds distribution process be provided? Should this be through the NGR and/or AEMO procedures?	Yes and Yes
24. How costs could be allocated	
1. Do you agree with the proposed cost allocation methodology — that costs be recovered from relevant entities based on their share of gas demand at the locations where a SoLR reserve is established and in each	In principle GBE supports user/ causer pays.

month that the SoLR reserve is in place? Or are other alternative approaches preferred? Why?	
2. Are there other benefits and costs of the proposed cost allocation method that the AEMC should consider?	It is imperative that parties are not looking to SoLR as a back-up for aggressive portfolio management, contracting, trading or practices that are not in the best interests of the market (i.e. lack of investment in operating assets). On any day that the SoLR is bid into the market, it should be bid at the market price cap as it represents market participants are incapable of curing the problem. Any prudent market player with sufficient supply to meet its own needs will not be exposed to this price given the nature of both the STTM and the Victorian DWGM. Any market player with insufficient supply will pay the market cap. Only in circumstances where there is a physical inability to supply the market would the market revert to an Administered Price and AEMO need to determine liability for the shortfall.
25. How proceeds could be distributed	
1. Do you agree with the proposed proceeds distribution methodology — that proceeds be distributed to relevant entities in a timely manner based on their share of gas demand at the locations where a SoLR reserve is established? Or are other alternative approaches preferred? Why?	GBE is of the view that parties who bare the financial burden and take the risk for the establishment and management of the SoLR should recover investment.
2. Are there other benefits and costs of the proposed proceeds distribution method that the AEMC should consider?	
26. Providing transparency about cost recovery and proceeds distribution	
1. Which aspects of the cost recovery and proceeds distribution process should be in the NGR, and which aspects should be in the ECGS Procedures to support transparency to market participants? Why?	

27. Establishing financial separation for the SoLR mechanism	
1. Do you agree with the proposal that AEMO establish a separate financial account for its use of the SoLR mechanism? Why?	Yes. AEMO's principal role is the operation of the market, not participation in the market. The two elements need to be totally separate.

CHAPTER 9 – PROVIDING TRANSPARENCY AND ACCOUNTABILITY

28. Improving the market notices to better inform the market	
1. Are the number of market notices and the information they contain provide appropriate transparency to market participants about AEMO's actions in using a SoLR mechanism?	GBE is generally comfortable with the notices provided. In the event of a potential critical or emergency event, GBE would expect notices should be provided more broadly i.e. outside of market participants to the general public.
2. Are the potential links between the risk and threat signalling levels and the SoLR-related market notices appropriate?	
29. Publishing a post-intervention report	
1. Should AEMO be required to publish a post-intervention report within one month of an intervention in the market?	Yes
2. Should AEMO also have the discretion to provide a supplementary report at the four-month mark, if it considers it would be appropriate?	Yes, especially if it is proposed that changes need to be made to the market
30. Publishing biannual reports	
1. Would regular reporting from AEMO on its market intervention activities (in addition to postintervention reports) be valuable to market participants?	
2. If so, should AEMO be required to report on its SoLR activities on an	

annual or biannual basis?	
31. Reporting to energy ministers and affected jurisdictions	
1. Should AEMO continue to be required to provide an annual report to energy ministers about any SoLR activities, if the proposed additional reporting requirements are introduced?	

CHAPTER 10 – IMPLEMENTING A SOLR MECHANISM

32. Implementation costs	
1. Do you have any concerns about the implementation costs of AEMO procedures and/or guidelines?	
2. Are there other implementation costs the AEMC should consider and is there a way to minimise them?	
33. Closing the trading fund	
1. Do you agree with the proposed approach to closing the trading fund?	Yes
2. Are there any other issues that may arise in a transition away from the trading fund that the AEMC should consider?	
34. Updating ECGS procedures and guidelines	
1. Is the proposed six months for updating ECGS procedures and guidelines achievable? What impact could this timeframe have on AEMO and market participants?	
2. If a six-month timeframe is not appropriate, what should be the alternative timeframe and/or approach?	
3. Are there other processes or information	

(in addition to those identified by the proponents) that AEMO should include in its procedures or guidelines? Why?	
35. Changing the Dandenong LNG interim arrangements	
1. What are your views on how a SoLR mechanism should apply to the DWGM Dandenong LNG storage facility arrangements?	
2. Should the current Dandenong LNG interim arrangements cease as anticipated in 2029, leaving AEMO to use the ECGS SoLR mechanism to address reliability and supply adequacy threats for the DWGM? What issues should the AEMC consider to achieve this?	
3. Should an ECGS SoLR mechanism and the DLNG arrangements co-exist? What changes to the current DLNG arrangements, and the proposed design of the SoLR mechanism, would be required in this case?	

APPENDIX A – MAKING OUR DECISION

36. Assessment framework	
1. Do you agree with the proposed assessment criteria?	
2. Are there additional criteria that the Commission should consider or criteria included here that are not relevant?	