

14 January 2016

Richard Owens
Senior Director
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged electronically: www.aemc.com.au

Dear Mr Owens

AEMC 2015 - Multiple Trading Relationships (MTR) Draft Rule Determination

EnergyAustralia welcomes the opportunity to comment on the Australian Energy Market Commission's (AEMC) Multiple Trading Relationships (MTR) Draft Rule Determination. We are one of Australia's largest energy companies, with over 2.5 million household and business customer accounts in NSW, Victoria, Queensland, South Australia and the Australian Capital Territory. We also own and operate a multi-billion dollar portfolio of energy generation across Australia, including coal, gas and wind assets with control of over 4,500MW of generation in the National Electricity Market.

The decision by the AEMC to not make a draft rule change for Multiple Trading Relationships is fully supported by EnergyAustralia. As mentioned in our submission to this rule change proposal there is a low demand for this capability in the market and it can be delivered at much lower cost than the proposed MTR model by establishing a second connection point or with sub-metering under a commercial arrangement. EnergyAustralia is pleased that the AEMC considered the significant cost impact to industry participants that would ultimately be passed onto all consumers while assessing this rule change.

The draft decision to not proceed with this complex MTR model will also assist the market by allowing greater focus on the effective delivery of the other Power of Choice initiatives. Industry expertise covering many of these initiatives is limited and these resources are required to ensure the best outcomes are delivered for the market. There is also a limit to the number of system releases that can be achieved each year so it is important to optimise any market changes. While improvements in the market are necessary it is important to also ensure they are delivered efficiently and at a time when many consumers are demanding these capabilities.

Should you require further information regarding this submission please call me on 03 8628 1437.

Yours sincerely

[Signed]

Randall Brown
Industry Regulation Lead



EnergyAustralia

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