Australian Energy Market Commission
PO Box A2499
Sydney South NSW 1235

By electronic submission

15 October 2012

Dear Commissioners,

Re "Power of choice" draft report – giving consumers options in the way they use electricity

International Power-GDF SUEZ Australia appreciates the opportunity to comment on the "Power of Choice" draft report.

In our submission we have focussed on the Commission's recommendations relating to demand response and efficient and flexible pricing. We encourage the Commission to consider our arguments and would be happy to meet with you to discuss these in person.

Should you have any enquiries regarding this matter please do not hesitate to contact Mr Greg Hannan on +61 3 9617 8405.

Yours sincerely

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International Power GDF SUEZ Australia Submission to the AEMC's "Power of Choice" draft report

(AEMC Reference EPR0022)

15 October 2012

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1 Executive Summary

Demand side participation was always intended to be integral to the NEM's design and International Power-GDF SUEZ Australia (IPRA) supports the objective of facilitating (though not subsidising) demand side participation.

IPRA believes that the absence of efficient and effective price signals in the regulated areas of network and retail pricing have been the greatest impediment to greater demand side participation in the NEM.

The major recommendations of the Commission's draft report have been to move toward time of use network pricing and to reward demand response by making it eligible to be valued at the prevailing spot price. The latter would rely on multilateral arrangements between the system operator (AEMO), the customer and their retailer. If risk is priced in an economically efficient manner, IPRA's assessment indicates these arrangements would perversely result in higher costs to demand response customers. IPRA's submission arrives at the following conclusions on these the two major themes of the draft report.

Efficient and flexible pricing

Efficient pricing will be achieved when the cost of electricity reflects the cost to produce it (or at the margin avoid using it), retail it, and deliver it to customers. We favour real time pricing and a reliance on the most efficient price signals to customers. IPRA therefore considers that a combination of network capacity charging and time variable energy charging would reflect the appropriate price signals for customers in the long term.

Consistent with these principles we encourage the Commission to recommend deregulation of energy pricing in those jurisdictions yet to make this necessary step.

Demand response

The complex proposal to explicitly reward demand side response presented in the Power of Choice draft report fails to recognise the way in which demand side is currently valued in the NEM. IPRA does not believe that the Commission has made a sound economic case in favour of this proposed complex, cumbersome and costly regulatory change.

Having considered the proposal from retail, generation and risk management perspectives, IPRA concludes that the proposed changes are a complicated, inefficient and less flexible way of delivering an arrangement which is already available to market participants. Customers with DR capability can readily achieve the fair value of their demand response capability under existing market arrangements. We therefore do not support the proposal outlined in the draft report.

IPRA prefers that the Commission encourage customers with demand response capabilities to seek more sophisticated contractual arrangements from their retailer or other providers of financial products. This would more effectively provide the desired benefits for customers with demand response capabilities within the existing market arrangements, and would avoid the costly and economically inefficient arrangement proposed by the Commission.

2 About International Power-GDF SUEZ Australia

International Power-GDF Suez Australia (IPRA) welcomes the opportunity to comment on the Australian Energy Market Commission's (the Commission's) draft "Power of Choice" report.

International Power, a wholly-owned subsidiary of GDF SUEZ, is a leading independent electricity generating company with 75,579MW gross (43,288MW net) in operation and a significant program of 12,820MW gross (5,868MW net) projects under construction as at 31 December 2011. International Power is present in 30 countries across six regions worldwide. Together with power generation, International Power is also active in closely linked businesses including downstream LNG, gas distribution, desalination and energy retail.

IPRA entered the Australian energy industry in 1996 and has grown to become one of the country's largest private energy generators, with assets in Victoria, South Australia and Western Australia. The IPRA portfolio also includes Simply Energy, a significant second-tier gas and electricity retail business operating in Victoria, South Australia, New South Wales and Queensland. At the group level, GDF SUEZ also has expertise in energy management services through its Cofely business line.

3 Introduction

Demand side participation was always intended to be an integral part of the NEM "energy only" market design, and the market, from inception, provided for demand to participate in the wholesale spot market and to bid for dispatch. IPRA supports the ongoing objective of encouraging demand side participation, but not of subsidising it. In its submission to the May 2012 "Power of Choice" directions paper, IPRA urged the Commission to resist any measures which may give demand response preferential treatment over conventional generation.

IPRA argued this would distort market outcomes due to a reliance on cross-subsidies and result in economically inefficient outcomes. In this submission, IPRA expands on the arguments outlined in its submission to the "Power of Choice" directions paper. IPRA has particularly considered the proposals outlined in Chapter 5 of the draft report in detail and has focussed on this aspect of the draft report in its submission. We also make comments in support of the Commission's desire for more efficient and flexible pricing options for customers.

4 Proposal for demand side participation in the wholesale market

The Commission's focus on demand response (DR) in the wholesale market appears in a context of wider public debate around the cost of electricity for consumers. Any serious discussion on electricity prices should acknowledge that customer bills are made up of a number of components – the cost of energy, the cost of delivering it over networks, the cost to retail it and the costs of environmental policy objectives.

The causes of the recent increases to customer electricity bills have been well documented as arising from the cost of upgrading and maintaining networks (especially distribution networks) and the cost of funding environmental policy objectives. Ironically, the debate around electricity prices is occurring as wholesale electricity prices have been declining in real terms. IPRA suggests the Commission should assist its stakeholders' understanding by making it clear that DR will only impact

the 30-40% of current customer bills that arise from the actual production cost of the electricity. Impacts on network costs will only appear indirectly, and at a later time.

4.1 Does the AEMC proposal offer something new?

IPRA is not opposed to either competition from demand response being rewarded on a commensurate basis with generation because of the real effect it has on demand. However we do not support the proposal outlined in the draft report.

Having considered the proposal in detail, we believe it to be a complex mechanism that offers at best no greater benefits to customers than currently exists. Further, it may lead to price increases to DR customers due to the inherent difficulty of counterparties assessing volume and price risk.

Based on our consideration of the proposal we find the following:

- The proposal assumes that DR is not valued currently in the NEM and that DR value will be unlocked by this proposal;
- The financial outcomes associated with the proposed scheme can be replicated under existing market arrangements and regulations, with some retailers already offering demand response related contracts;
- The proposal represents a costly and convoluted framework for delivering at best, the status quo;
- The proposal has the potential to distort the dispatch process and market information in the NEM;
- The proposal relies on a retrograde step toward estimated or deemed settlement rather than using actual consumption in settlement, with resulting significant issues associated with assessment, validation and risk of gaming; and
- The proposal relies on experience from US markets which are not directly transferable to the NEM given its fundamentally different design.

IPRA elaborates on each of these points below focussing on how the proposal relates to commercial and industrial (C&I) customers consistent with the focus of the draft report.

We have also provided commentary on the settlement, measurement and verification aspects of the proposal in Appendix 1.

4.2 No new money, no new economic benefits

In order to assess the Commission's DR response proposal, it is worth considering options available to DR customers under current arrangements. They are as follows:

a) Avoided power purchase costs

Customers can elect to be exposed to the spot market and receive the benefit of avoided energy purchase costs. This can be achieved by becoming a market load or by arranging a spot market pass through contract with their retailer. More sophisticated customers are able to utilise financial markets to hedge their exposure and obtain value for the optionality provided by their DR capability.

b) Discounted tariffs for DR load response

Customers can choose to offer their DR service to a retailer in exchange for a discounted tariff. In this case a DR customer doesn't receive a specific payment during a DR response event, but enjoys a discount on their tariff and avoids the tariff costs on the DR volume during the DR event. There are examples of this occurring in the NEM over the last 12 years. If the instruments are efficiently priced, the additional benefit to DR customers over and above arrangement (a) is to even out the energy payments, but at a slightly higher cost.

c) Payment for DR load response

Alternately, DR customers can enter into an arrangement where they pay a tariff and receive a payment equal to the product of their DR volume and spot price during a DR event. This can exactly replicate the financial payoffs under the AEMC proposal and is essentially equivalent to the DR customer buying a financial hedge on its total load, and then not consuming at the time of high price.

The DR is exposed to the operational risk associated with their demand response capability and spot price outcomes.

Examining the AEMC proposal in contrast to the above arrangements, the AEMC proposal amounts to the following:

- DR customers pay the tariff on the baseline load and receive the spot market revenue equivalent to the DR quantity at the spot market price,
- The retailer pays for the baseline amount on its spot market purchases and receives the tariff on the baseline volume from the DR customer.

Under this arrangement the retailer needs to hedge its own spot price exposure to the DR customer in the same way as a normal customer to reduce its exposure to the spot market price, and so the costs of hedging will be the same (or higher, see below). Therefore there is no net financial benefit of this arrangement to the DR customer, either through a lower cost from its retailer, or through the costs of hedging its supply, compared to what is achievable / available under existing arrangements.

Further, the remaining leg of the proposal, where AEMO pays the DR customer as the product of the spot price and the DR quantity, delivers no greater cost saving to the DR customer than not consuming under current arrangements. Also, the difficulties in estimating the baseline amount and predicting the value of demand that in the end will not exist, creates risk of inefficient hedging, and hence efficiency losses in the market.

However to deliver the AEMC proposal, settlement systems would need to be modified (for DR customers, all retailers and AEMO). This will represent a significant cost to the industry. Introducing "deemed" values into settlement is also problematic, as validation assessments will be required and there is a risk of gaming.

The Commission's proposal seeks to "hard wire" an inflexible financial arrangement into the market settlement systems for a physical product. This would be far more costly and much less flexible than leaving market participants to develop innovative retail products which are structured to deliver best value for their specific DR capabilities and risk appetite.

The Commission's proposal does not provide any substantial benefits to encourage DR response, but stands to increase the complexity of settlement and would require a significant expense to implement with no benefits over and above what is currently able to be achieved by market participants.

In summary, there is no new money and no economic case has been demonstrated in support of the arrangement.

4.3 How is DR valued in the NEM at the moment?

The Commission's proposal assumes that demand response is not currently valued in the NEM. IPRA considers this assumption is incorrect. We are concerned the Commission has not made it clear to its stakeholders that while DR may not be explicitly valued, as it would be under the proposal; it nonetheless is currently implicitly valued.

Retailers inherently value DR in the pricing they offer to C&I customers. When a retailer offers a price to a C&I customer, it does so based on analysis of their historical consumption patterns.

Customers that have used embedded generation to lower their demand at times of high prices, or with the ability to do so in the future, already receive a discounted rate for their energy. This reflects the fact that on a risk adjusted basis it is cheaper for the retailer to hedge the reduced demand from this customer.

The terms and conditions of offers for C&I customers also typically allow the retailer and/or the customer to seek recompense if the customer's load characteristics change fundamentally such that the consumption no longer matches the hedging strategy used by the retailer for that load. This provision gives both the customer and the retailer the right to adjust pricing levels if the initial offering did not fairly price any demand response.

IPRA believes this implicit valuation of demand response in the NEM at the moment has been overlooked by the Commission and led to the conclusion that there is value to be extracted by valuing DR in a new way.

The NEM also allows customers to determine their level of consumption based on competitive offers and to participate directly in the wholesale market. In addition, it is possible for C&I customers with DR capability to obtain a tariff based on the spot market price, and therefore directly benefit by reducing consumption in the highest priced periods and reducing the overall price they pay for electricity.

We acknowledge that there has been limited uptake of these approaches, but these provide examples of existing mechanism in the NEM for DR to be valued and participate in the wholesale market.

We urge the Commission to review the assumption that demand response is not valued in the NEM as this fundamentally changes the merits of the alternative proposal put forward.

4.4 Is there a better way to achieve the same result?

If the Commission's objective is for an explicit reward for demand response rather than the implicit reward it already receives, then it can do so without regulatory change.

The Commission's proposed scheme is essentially a financial arrangement between the retailer and the customer which is being engineered into the market systems. Such financial arrangements are able to be agreed between retailers and customers now, without the need to modify any market systems or processes.

There is also greater flexibility for the market to develop and implement financial solutions which are specifically designed around the customers demand management capability and which enable retailers

to pass through benefits in their tariff on a fixed or variable (eg spot price related) basis. It is our understanding that such arrangements have been agreed with customers in the past.

Rather than pursue the proposal, the Commission could encourage greater explicit reward of DR by encouraging C&I customers to seek offers from retailers that

- Value any DR at the prevailing wholesale spot price; and/or
- Provide customised risk management product offerings to accommodate customers with DR. For example, DR customers could buy swaps from and sell caps to their host retailer and/or third parties.

The fair value of the payments that customers would receive under the first option above would be equal to the fair value of the increase in underlying tariff that a retailer would offer to remain cost neutral.

The fair value of the payments that customers would receive under the second option above would also be equal to the fair value of any payments that customers would receive under the Commission's proposal.

These suggestions rely on existing regulatory arrangements. They also rely on bilateral arrangements between customers and retailers, rather than introducing third parties (such as the system operator) unnecessarily into the process.

The advantages of these simpler approaches are that there would be no costs (to the whole market) of implementing multilateral settlement arrangements and developing algorithms to determine customer baselines.

These simpler approaches would also create opportunities for retailers to provide specialist offers to C&I customers. For example, a company such as Enernoc could obtain a retail licence or an Australian Financial Services Licence and provide these specialist services to C&I customers.

IPRA therefore recommends that the objective of the Commission should be to encourage and facilitate the participation of specialist providers of risk management products and services in the market for DR customers.

4.5 Other disadvantages

In addition to our main argument that the proposal is a complex and expensive way of delivering the status quo, IPRA has further concerns as follows:

Inaccuracy in settlement

We believe that relying on deemed consumption in settlement rather than actual consumption is inconsistent with trends in the industry toward more accurate settlement. This is particularly relevant since the C&I customers targeted by the Commission are the ones most likely to have an accurate interval meter.

Inaccuracy in dispatch

We note that the Commission's preference is for any demand response to be scheduled; however it is highly likely that this would initially occur from non-scheduled resources. With negligible volume this is unlikely to alter the dispatch process materially. However, with greater uptake the risk of

inaccuracies in dispatch increase, particularly the accuracy of the relationship between DR and spot price.

Investment signals

The Commission has stated that DR is equivalent to the role that peaking generators play in the NEM. While this is true at a principle level, in practical terms most DR may not offer the same level of certainty of dispatch as generation, and hence may deliver a lower level of reliability. Valuation of the DR needs to reflect the quality and reliability of the DR provided.

IPRA contends that greater consideration be given to determining if the greater uptake of DR in the NEM would undermine investment signals for new generation. Generators typically offer their volume to market to reflect their short run costs and rely on situational market power and a common cleared price to achieve the long run returns that their investment of capital requires.

While IPRA supports delivery of the most economic means of matching supply and demand, given that DR is likely to come from facilities which have been built for other commercial reasons (eg. factories, industrial processing plants) then the pricing of DR would reflect the opportunity cost of lost production and not necessarily the marginal value of supplying an increment of supply in the NEM in an enduring manner.

4.6 Are the overseas examples provided relevant?

Section 5.4 of the Commission's draft report estimates the proposal could potentially apply to 2,100-2,800MW of demand response from C&I customers.

IPRA would like to see greater scrutiny of this figure and also consideration of the applicability of experience in North Eastern US energy markets which feature capacity payments, to the NEM. A better comparison may be with practice in the ERCOT energy only market in Texas, though it is a net pool design, and is unlike NEM in this regard.

It is also worth emphasising that comparisons between electricity markets and power systems are problematic because of different institutional and governance arrangements, as well as fundamental differences in size, and the structure of the supply and the demand side.

In the case of comparisons between the NEM and US power systems, these differences also relate to long standing operational practices, in terms of the degree of reliance (in the United States) on interruptible loads to manage contingencies and the role that loads play in capacity markets.

Many US wholesale markets incorporate a "capacity obligation" whereby retailers must show that they have sufficient capacity to meet the demand of their customers (including capacity in the form of reliability DR); many also have day-ahead capacity markets in which loads can commit to reducing demand in real-time in the event that they are called.

5 Efficient and flexible pricing

IPRA is supportive of moving electricity pricing to a more cost reflective basis. We have argued throughout the Power of Choice consultation process that the opaque nature of electricity pricing for customers has been a key inhibitor of facilitating customer choice with respect to their consumption.

5.1 Time of use pricing

IPRA's view is that the complex pricing structure for customers that bundle the cost of energy, the cost of networks and the cost of other government programs (eg. renewable obligations, energy efficiency schemes, smart metering) largely into a single energy rate provides poor price signals. This also contributes to the inefficient use of, and inefficient investment in, networks, by rewarding poor network utilisation and penalising efficient network users.

We support the Commission's intent to move toward more efficient and flexible pricing options. We also endorse the Commission's recommendations to transition toward flexible pricing structures to ensure that public support is maintained and not lost.

5.2 Network pricing

In its submission to the "Power of Choice" directions paper, IPRA argued that if given a choice between volume (kWh) or capacity (kW) based network charges, the economically efficient preference was for charging on a capacity basis. The Commission has extensively outlined the role of peak demand in driving the need for network augmentation and that during lower demand periods the marginal cost of operating networks is relatively low (essentially only network losses).

Network capacity charging (based on maximum demand) would further connect customer usage behaviour and decision making and their impact on the networks. With peak demand driving network expenditure there are currently limited incentives for customers who adjust their usage to coincide with periods where the network is least stressed.

Currently the costs of networks are smeared across all customers via a variable energy charge. In relation to mass market customers this means that those people without air conditioning pay the network costs required to supply those with air conditioning.

Customer decision making when purchasing appliances such as air conditioning is done without any regard to how these devices influence the use and cost of networks. If there was a move toward capacity charging this behaviour would change and the connection between peak usage and electricity billing would be obvious to customers through their electricity bill.

Greater reliance on network charging on a capacity basis would also create opportunities in areas such as direct load control of customer loads (such as air conditioners and pumps) and support time of use network tariffs as customers would be given a direct price signal on which to base their consumption decisions. This is also the basis of the "smart grid" concept. In our view, adopting capacity based charging for networks offers the most potential to unlock value associated with demand response and to reduce electricity costs to consumers.

IPRA recognises that any move toward capacity charging of network tariffs would require an extensive public education campaign and also careful analysis as to how this change would affect vulnerable customers.

We note that one of the central recommendations of the Commission's draft report is to implement time of use network pricing. The Commission has outlined extensively the role of peak demand in driving the need for network augmentation and that during lower demand periods the marginal cost of operating networks is relatively low (essentially only network losses).

IPRA is not convinced that time varying network pricing is the most economically efficient price signal to give customers more choice into how they use electricity. We also believe that time varying network pricing allows the sculpting of tariffs to match demand.

Even if demand patterns change in response to the time varying network tariffs, these will continually be adjusted to ensure network businesses have revenue adequacy.

IPRA maintains that the combination of capacity charging for networks and real-time pricing of energy costs with sufficient protections in place for vulnerable customers would give customers the most efficient price signals in relation to their usage of electricity.

Capacity charging would affect purchasing decisions of customers and would be aligned with the contribution peak demand makes to the need for network augmentation. Time varying energy tariffs would reflect the varying cost of generating electricity across seasons and across the day.

5.3 Retail deregulation

IPRA maintains that an ongoing commitment to retail price deregulation is necessary to facilitate sustainable investment in the NEM. Our view is consistent with those expressed by the Federal Government in the draft Energy White Paper (EWP). The draft EWP was clear that retail price deregulation was a priority issue in the development of future Australian energy policy. We raise this issue as it relates to the draft report's focus on "efficient markets characterised by effective participation of both the supply and demand side."

5.4 Consumer access to electricity consumption information

IPRA recommends that rights to information and benefits of a demand side management capability must rest with the customer. At the same time IPRA supports the right of customers to transfer of these rights to third parties by agreement and for a fee.

If customers have greater and more straightforward access to their own consumption data it is our preference that technology (eg. web based tools to monitor and control appliances and other loads, smart phone applications or in-home displays) and innovation be relied on to realise any demand side benefits.

In relation to customer data it is essential that privacy provisions between consumers and retailers are respected and consumer information should not be made available to outside service providers.

Essentially customers should be legal owners of their own data.

5.5 Enabling technology

IPRA supports the Commission's approach of establishing an overarching framework to encourage commercial investment in better metering.

Appendix 1 – IPRA comments on proposed demand response mechanism

In the table below IPRA has provided comments on the description of the proposal as outlined in Section 5.3 of the Commission's draft report.

Contractual arrangements and the consumer's estimated consumption	
Consumers providing a demand response must have a retail contract in place with a registered Market Customer (i.e. a retailer).	The proposal relies on a retail contract being in place. In a competitive retail market, companies such as Enernoc are able to obtain a retail license and offer a specialised suite of products targeted at C&I customers with embedded generation or the ability to reduce demand.
The retailer will be settled in the wholesale market based on the consumer's estimated baseline consumption. Consumers would be expected to pay their retailers according to their estimated consumption at the retail tariff.	Settlement moves towards deemed rather than actual consumption. This is inconsistent with trends for greater reliance on metering in settlement. For example, in the draft report the Commission prefers that customers with interval metering be settled on their actual consumption rather than the net system load profile. Settlement is now reliant on algorithms in preference to actual data.
Consumers register their participation under the demand response mechanism with AEMO.	AEMO is inserted into settlement between customers and retailers. This is an unnecessary complication of the settlement process. Good faith provisions would also need to apply to providers of demand response in the same way as for generators and this issue has not been considered.
Consumers can choose to have their demand resources participate on a scheduled or non-scheduled basis, subject to any threshold requirements.	IPRA believes that DR should be scheduled if in aggregate it reaches material levels to ensure the market has the best information available to optimise their operations. If the demand response was categorised as non-scheduled then this introduces distortion into the dispatch process. For small levels of demand response this would be negligible but would increase with greater uptake.
The quantity of demand response consumers deliver to the wholesale electricity market during the demand response interval is calculated as the difference between their estimated consumption and the actual metered consumption at their site.	Comments already made regarding suitability of estimated consumption.
A method would need to be developed for	Accepting that such an algorithm has been developed in overseas markets, this introduces the

calculating consumers' estimated consumption.	prospect of gaming. Continual monitoring and validation and updating of parameters in the model would be required, particularly for temperature sensitive loads. This technical and systems issues associated with this should not be underestimated.
Market operation, scheduling arrangements and the impact on the spot price	
Subject to threshold requirements consumers should be required to notify their retailers and AEMO of their intention of beginning a demand response interval by the start of the interval, and similarly at the end of the demand response interval.	
The operation of the dispatch does not change and the calculation of the spot price would continue as it does now where the marginal scheduled bands of generation or demand resource would be the basis for the spot price.	See earlier comments on dispatch accuracy. In addition, the impact on pre-dispatch, actualised and forecast market data will need to be addressed.
Non-scheduled demand resources. If the demand resource is non-scheduled then the reduced demand may indirectly lead to a spot price that is lower or unchanged. Non-scheduled demand resource participating under this mechanism would be exposed to the same price risk as a demand resource on tariff which is dynamic and changes with the spot price.	
Scheduled demand resources. If the demand resource is scheduled it would appear in AEMO's dispatch process in the same way as scheduled demand does now and would be dispatched in accordance to its bid. This could result in the partial dispatch and price being set by the demand resource bid.	The mechanism for scheduled demands to participate in dispatch currently exists.
Settlement and the impacts on retailers and consumers	
AEMO pays consumers for the quantity of demand response delivered to the market during the trading interval at the spot price. As a result, consumers participating in the mechanism pocket the difference between the spot price and the retail price (energy component).	AEMO is now introduced into the customer billing process. The mechanism to 'unlock' value to the customer ignores the fact that as a competitive differentiator, retailers would normally offer C&I customer who provides demand response at peak times a discounted tariff based on the fair value of any demand response. In short, the fair value of such a demand response

	can be negotiated with the customer through a reduced tariff. This is akin to a long-term contract with a peaking generator which levelises the value of protection from a cap contract.
A verification or auditing process may be required to confirm the amount of demand response delivered to the wholesale market by the consumer.	The proposal creates new regulatory and administrative overheads, which would need to be justified with a cost benefit analysis.
Subject to detail on the accuracy of the consumer's estimated consumption, the retailer would be cost neutral to the arrangements. The consumer providing the demand resource would benefit from difference between the retail tariff and the prevailing spot price net of any lost production.	This statement in practice relies on the assumption that the estimated consumption can be perfectly measured. In practice this is impossible, and retailers would incur risk.
Consumers pay the network use of system charges based upon their actual consumption volume, not their estimated consumption.	

6 Glossary

Abbreviation	Description
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
CO_2	Carbon Dioxide
CPI	Consumer Price Index
CPT	Cumulative Price Threshold
DR	Demand response
DPRG	Dispatch and Pricing Reference Group
EOM	Energy Only Market
ETS	Emission Trading Scheme
FCAS	Frequency Control Ancillary Service
FIT	Feed In Tariff
IPRA	International Power-GDF Suez Australia
LNG	Liquid Natural Gas
LRMC	Long Run Marginal Cost
MPC	Market Price Cap
MWh	Mega Watt Hours
NEL	National Electricity Law
NEM	National Electricity Market
NEO	National Electricity Objective
NER	National Electricity Regulation
NSP	Network Service Provider
O&M	Operation and Maintenance
PGG	Private Generator Group
RET	Renewable Energy Target
RIT-T	Regulatory Investment Test - Transmission
RRP	Regional Reference Price
SACP	Shared Access Congestion Pricing
TFR	Transmission Frameworks Review
TNSP	Transmission Network Service Provider
TUOS	Transmission Use of System
VEET	Victorian Energy Efficiency target