

12 November 2015

Ben Noone
Australian Energy Markets Commission
PO Box A2449
Sydney South NSW 1235
Submitted via AEMC website - GRC0033

Dear Ben,

Enhanced Information for Gas Transmission Pipeline Capacity Trading)

Thank you for the opportunity to provide comment on the Enhanced Information for Gas Transmission Pipeline Capacity Trading Draft Determination (draft rule). We note the AEMC has made a more preferable rule in order to improve the information provided to the east coast gas market via the Natural Gas Services Bulletin Board (BB). We note the draft rule amends the National Gas Rules (NGR) to require additional information from transmission, production and storage facility operators in order to increase market transparency.

Stanwell's interest in the gas market is as a trader of gas and industrial buyer for the gas-fired Swanbank E and Mica Creek power stations. Stanwell is an active participant in the Brisbane STTM and Wallumbilla hub.

Stanwell supports the AEMC's more preferable rule. It appears to appropriately balance the needs of participants for more information with the costs to facility operators of providing this information. We congratulate the AEMC for appropriately considering and incorporating the feedback of participants during this rule change process.

We note the ACCC is considering whether to grant approval to the LNG facilities to coordinate their maintenance schedules. If this approval is granted, it is likely that the ACCC may request that this market sensitive information be made public. If this were to occur, it would ideally be published on the BB in a consistent manner with the proposed standardised medium term capacity outlooks.

COAG has also tasked AEMO to initiate a procedure change in order to reclassify Wallumbilla as a Demand Zone. The reclassification will oblige extra pipelines to participate in reporting to the BB. This has been acknowledged as a "short cut" and "quick fix" and is being implemented regardless of the conclusions from AEMC's East Coast Wholesale Gas Market and Pipeline Frameworks Review. While Stanwell supports the extra market transparency this procedure change will provide, we are disappointed by this further demonstration of the lack of coordination between COAG, AEMO and the AEMC.

Thank you for your consideration of Stanwell's response to the draft rule. If you would like to discuss any aspect of this submission, please contact Jennifer Tarr on 07 3228 4546.

Regards

Luke Van Boeckel
Manager Regulatory Strategy
Energy Trading and Commercial Strategy

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