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8 October 2015

Ms Leah Ross
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Project reference code: GRC0034

Dear Ms Ross

APA Group (APA) welcomes the opportunity to comment on the Australian Energy Market Operator (AEMO) Rule change request in respect of the Declared Wholesale Gas Market (DWGM) Operating Schedules.

APA agrees with the desirability of amending the National Gas Rules to address the matters raised in the AEMO Rule change request. In respect to the specific drafting of amendments, APA provides the following comments:

- Rule 215. APA considers that the AEMO proposed drafting is preferable to that proposed by the AEMC as it believes that the AEMO proposal does not change the substance of the Rule, except in the respect intended.

APA considers that the AEMC proposed drafting, which changes the AEMO obligation to 'use' valid demand forecasts and bids to set the operating schedules, to being required to prepare operating schedules that are 'based on' valid demand forecasts and bids changes the nature obligation on AEMO in an unintended way.

- New Rule 215A. APA supports the inclusion of this new Rule as proposed by AEMO.
- Rule 221. APA supports the AEMC's proposed consequential amendments to the parallel provisions with respect to the pricing schedule.

If you would like any further information, please call me on 02 9275 0020.

Yours sincerely

Alexandra Curran
Regulatory Manager