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14 January 2016

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

**Re: ERC0181: Multiple Trading Relationships Draft Rule Determination**

Red Energy (Red) and Lumo Energy (Lumo) welcome the opportunity to respond to the Australian Energy Market Commission (the Commission) on the Multiple Trading Relationships Draft Rule Determination.

Red and Lumo are 100% Australian owned subsidiaries of Snowy Hydro Limited. Collectively, we retail gas and electricity in Victoria and New South Wales and electricity in South Australia and Queensland to approximately 1 million customers.

The Draft Rule Determination concludes that there are limited efficiency benefits outlined by the proposed rule, and it is likely to deliver minor direct cost savings to a small number of customers whilst significantly increasing the complexity and costs to the remainder of customers.

As such, the Commission correctly assessed that the proposed rule does not meet the National Electricity Objective and the National Energy Retail Objective, and therefore should not be made.

Red and Lumo support the draft decision made by the Commission, particularly as the existing framework allows for multiple retailers at a site. Red and Lumo supports the Commission's view that the multiple trading relationships rule change is not warranted.

Should the Commission have any further enquiries regarding this submission, please call Stefanie Macri, Regulatory Manager on 03 9976 5604.

Yours sincerely

**Ramy Soussou**  
General Manager Regulatory Affairs & Stakeholder Relations  
**Red Energy Pty Ltd**  
**Lumo Energy Australia Pty Ltd**