

31 March 2014

Mr John Pierce
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged online: <http://www.aemc.gov.au>

Project reference: **GRC0024**

National Gas Amendment (National Gas Bulletin Board Capacity Outlooks) Rule 2014

Dear Mr Pierce

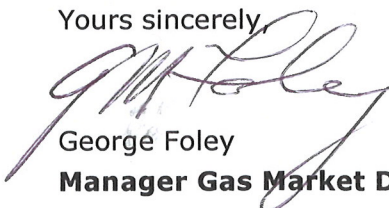
AGL submits the following in relation to the above rule change proposed by the Australian Energy Market Operator (AEMO). This particular rule change represents the culmination of numerous meetings and workshops on the topic of short- and medium-term outlooks to be submitted to the Bulletin Board Operator.

AGL is fully supportive of the rule change advanced by AEMO as it represents faithfully the outcomes of meetings devoted to this issue. The extension of a 3-day outlook period to 7-days for daily submissions to AEMO should involve no higher compliance costs or be any more onerous than at present. Planned outage information for the medium term will be provided to AEMO by a BB production facility operator, a BB storage provider, or a BB pipeline operator by forwarding any planned maintenance notification sent to a BB shipper. Alternative options, such as a rolling 365-day outlook for capacity, were considered but dismissed on the grounds that they would have generated significant compliance costs for information providers.

AGL is very much of the view that the package represents a major step towards information transparency in the gas industry but at a cost that is in keeping with the nature of the industry. We do not believe there are any confidentiality issues created by this proposal, or at least any more than is currently the case with information disclosure to the Bulletin Board.

I can be contacted on (03) 8633 6239 or at gfoley@agl.com.au.

Yours sincerely,



George Foley
Manager Gas Market Development

