



12 July 2013

Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Submitted electronically

Dear Sir/Madam,

**Re: EMO0024: First Interim Report: NEM Financial Market Resilience**

Lumo Energy is grateful for the opportunity to make a submission to the Australian Energy Market Commission (Commission) in relation to their First Interim Report on NEM Financial Market Resilience.

Lumo Energy is 100% owned by Infratil Limited, a company listed on the New Zealand and Australian Stock Exchanges. Lumo Energy currently sells gas and electricity in Victoria and NSW, and electricity in South Australia and Queensland, and is one of the largest second tier energy retailers. As such, it has a keen interest in the outcomes of the review and the extent it facilitates the efficient operation of energy markets in Australia.

It is noted that the request from the Standing Council on Energy and Resources suggests that the Commission reviews the consequences of a large electricity retailer failing and the impact on the NEM. Lumo Energy believes that the Commission should clearly define what is meant by a large electricity retailer and understand why the scope is limited to a NEM failure.

Lumo Energy also supports comments made by the Energy Retailers Association of Australia's (ERAA's) in their submission to the Commission. In particular, that the Commission should ensure that the Special Administration regime does not introduce further opportunities for moral hazard to occur.

Please do not hesitate to contact me on 03 8680 6439 or Stefanie Macri on 03 8683 2427 to discuss this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to be the name "Aneta", followed by a long horizontal line extending to the right.

**Aneta Graham**  
General Manager, Regulatory Affairs & Corporate Relations  
Lumo Energy Australia Pty Ltd