



**EnergyAustralia**

23 November 2015

Lyn Camilleri  
Director  
Australian Competition and Consumer Commission

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Dear Lyn

Lodged via Email: adjudication@acc.gov.au

### **Australia Pacific LNG Pty Ltd and Others applications for authorisation (A91516-A91517) – interested party consultation**

We are one of Australia's largest energy companies with over 2.5 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar portfolio of energy generation and storage facilities across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market

LNG export facility outages will create significant volatility in expected gas flows and market prices yet currently there is no visibility to gas market participants as to the timing of planned outages. The application explains the potential need to repurpose excess gas during outages which includes on-selling to third parties not privy to the maintenance schedules.

We agree that there are efficiencies to be gained by sharing information on maintenance schedules. However, parties to this agreement will have information not generally available to the market which materially affects gas prices. This will decrease confidence in the gas markets, including at Wallumbilla and Brisbane, and create an information asymmetry that is disadvantageous to new entrants and other participants in the retail market.

We have recommended to the Australian Energy Market Commission (AEMC) in a recent submission to the *Enhanced Information for Gas Transmission Pipeline Capacity Trading* rule change that planned outage schedules of LNG facilities be made available to all market participants<sup>1</sup>. This will remove the potential information asymmetry assist participants in organising their portfolios to utilise the excess gas, and encourage new entrant retailers.

EnergyAustralia believes that the approval of this request should be contingent on the above recommendation.

If you any have further questions please contact me on (03) 8628 4518 or at Ben.Hayward@EnergyAustralia.com.au.

Regards

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<sup>1</sup> <http://www.aemc.gov.au/getattachment/aa843ed6-c733-4aa6-8357-cbba0ba63e50/Energy-Australia.aspx>

A handwritten signature in black ink, appearing to read 'Ben Hayward', written in a cursive style.

**Ben Hayward**

Industry Regulation Analyst