



Determination

Application for authorisation AA1000484
lodged by the
Australian Energy Market Operator (AEMO)
in respect of cooperation and information sharing for the purpose of
responding to effects of the COVID-19 pandemic on the energy system

Authorisation number: AA1000484

17 September 2020

Commissioners:

Sims

Keogh

Rickard

Court

Ridgeway

Summary

The ACCC has decided to grant conditional authorisation to enable the Australian Energy Market Operator (AEMO) and participants in the Australian gas and/or electricity markets to cooperate to ensure the ongoing safety, security, or reliability of Australian energy systems during the COVID- 19 pandemic by:

- a) sharing information regarding ongoing operation at their facilities
- b) co-ordinating repairs and maintenance
- c) sharing essential personnel
- d) sharing essential inputs

Conduct between energy market participants under the authorisation must be facilitated by AEMO and does not allow for information sharing or agreements about the wholesale or retail price of energy, retail cost or profits.

The ACCC grants conditional authorisation until 31 May 2021. This is subject to four conditions, which impose reporting requirements on AEMO, particular reporting requirements on conduct undertaken by Liquefied Natural Gas (LNG) producers, requires that agreements formed under the authorisation not endure beyond the period of authorisation and sets out a process for adding other industry participants to the authorisation.

The ACCC has decided to grant authorisation until 31 May 2021.

1. The application for authorisation

- 1.1. On 30 March 2020, the Australian Energy Market Operator (**AEMO**), on behalf of itself, AEMO Industry Participants¹ and Other Approved Participants² (collectively, the **Participants**) lodged application for authorisation AA1000484 with the Australian Competition and Consumer Commission (the **ACCC**). This application for authorisation AA1000484 was made under subsection 88(1) of the *Competition and Consumer Act 2010* (Cth) (the **Act**).
- 1.2. The ACCC can grant authorisation which provides businesses with legal protection for arrangements that may otherwise risk breaching the law but are not harmful to competition and/or are likely to result in overall public benefits.
- 1.3. AEMO also requested the ACCC grant, under subsection 91(2) of the Act, interim authorisation to enable the Participants to engage in the Proposed Conduct³ while the ACCC is considering the substantive application. The ACCC has issued three interim authorisations, reflecting developments in the impact of COVID-19 in Australia and amendments to the conduct for which AEMO was seeking authorisation. A summary of these interim authorisations (including the dates on which they were issued and revoked) is set out in section 6.

¹ As defined at paragraph 1.4 a), below.

² As defined at paragraph 1.4 b), below.

³ See paragraphs 1.5 to 1.8, below.

The Applicant and Participants

1.4. AEMO was established by the Council of Australian Governments in 2009 to manage the National Electricity Market (**NEM**) and the eastern and south-eastern states and Australian gas markets. This role has expanded to now include responsibility for power in Western Australia and various gas market functions. The application was lodged by AEMO on behalf of itself and:

a) AEMO Industry Participants:

These are participants in Australian gas and/or electricity markets and their related bodies corporate that are registered, or with an approved exemption, in respect of markets and systems operated or managed by AEMO.

AEMO Industry Participants means each of the parties specified in Annexure D to this determination.

b) Other Approved Participants:

Any other parties involved in energy or related sectors who in the future wish to engage in the Proposed Conduct, provided the ACCC's prior approval is obtained through the process set out in condition 4 (see paragraphs 5.13 and 5.14), below.

The Proposed Conduct

1.5. Following amendments to the application for authorisation, AEMO is seeking authorisation to discuss, enter into or give effect to any contract, arrangement or understanding between the Participants, or engage in any conduct, which has the purpose of:

- a) ensuring the safe, secure and/or reliable operation of Australia's energy systems and/or the continued operation and integrity of the wholesale markets that underpin energy supply during the COVID-19 pandemic;
- b) ensuring ongoing energy supply to support consumers, businesses, government operations and the economy during the COVID-19 pandemic;
- c) minimising the risk of any energy outages during the COVID-19 pandemic;
- d) ensuring that there are sufficient resources to maintain and operate energy infrastructure, including personnel and essential inputs such as fuel, parts and equipment; or
- e) planning or preparing for the impacts of the COVID-19 pandemic in relation to any of the above,

and which falls in one of the following categories:

- i. **(sharing information regarding ongoing operation)** sharing of information related to the ongoing availability, performance and/or operation of AEMO Industry Participant facilities and any risks to ongoing availability, performance and/or operation
- ii. **(co-ordinating repairs and maintenance)** planning for and/or minimising any disruptions to energy supply, for example, by coordinating scheduling of any repairs, maintenance and other works requiring outages

- iii. **(sharing essential personnel)** sharing information and/or entering into common arrangements in relation to essential employees and contractors to ensure there are sufficient personnel to maintain and operate energy infrastructure
- iv. **(sharing essential inputs)** sharing information about the availability of, and/or entering into arrangements to share, essential inputs for energy production, generation, transmission, distribution and supply systems and infrastructure, such as parts, equipment or specialised resources necessary for essential maintenance, as well as other consumable materials necessary for the operation of AEMO Industry Participant facilities (but in all cases excluding fuel for thermal generators),

and is limited to:

- discussions, conduct, contracts, arrangements and/or understandings to which AEMO is either a party or has facilitated; or
- discussions, conduct, contracts, arrangements and/or understandings to which AEMO is not a party but which are carried out for the purposes of implementing a discussion, conduct, contract, arrangement and/or understanding that AEMO has facilitated.

1.6. The application further specifies that:

- a) where discussions relate to a specific state or territory jurisdiction, discussions will only occur where attended by a senior officer of the relevant state or territory government department with responsibility for energy, or their delegate,
- b) where conduct, contracts, arrangements and/or understandings relate to a specific state or territory jurisdiction, conduct, contracts, arrangements and/or understandings must be agreed to by, or arise out of a discussion attended by, a senior officer of the relevant state or territory government department with responsibility for energy, or their delegate.

1.7. Finally, authorisation is not sought for, and the conduct does not include, entering into any contracts, arrangements or understandings regarding the wholesale or retail price of energy; or sharing confidential information relating to retail pricing matters, cost or profits.

1.8. The conduct as described in paragraphs 1.5 to 1.7 is referred to in this determination as the **Proposed Conduct**.

2. Background

2.1. AEMO submits that the COVID-19 pandemic could have the potential to impact the reliability and security of Australian energy systems and markets. In particular:

- a) essential workers and contractors who perform regular maintenance and repairs of critical infrastructure may become unwell with the virus or otherwise be required to self-isolate;
- b) disruption to local and global supply chains as a result of the COVID-19 pandemic may result in shortages of parts, equipment, fuel or other essential resources that are necessary to produce and supply energy; and/or
- c) lock downs of cities and regional centres are leading to significant changes in demand patterns, which, without close management can have implications for system stability from a technical perspective.

- 2.2. AEMO is concerned that any disruption to the security of Australia’s energy systems could have significant consequences for consumers, businesses and the Australian economy.
- 2.3. AEMO originally applied for authorisation for a broader range of conduct, including sharing information, entering into arrangements on deferring non-essential works, gas availability, managing system stability, and any other conduct AEMO deems necessary as notified to the ACCC. Subsets of this wider range of conduct were permitted in the interim authorisations of 3 April 2020 and 17 April 2020.
- 2.4. On 19 June 2020, the ACCC sought information from AEMO as to the ongoing need for the authorisation, in the context of the COVID-19 pandemic in Australia appearing to be improving compared to when the application was lodged. On 16 July 2020 AEMO confirmed that, while there was an ongoing need for authorisation, it is appropriate for the Proposed Conduct to be narrowed to reflect AEMO's better understanding of the impact of the COVID-19 pandemic in Australia since the application was first lodged in March 2020. The Proposed Conduct set out in section 1 above reflects the narrowed conduct AEMO provided on 16 July 2020.

AEMO’s role in the energy market

- 2.5. AEMO’s role is to oversee the operations and security of the NEM power system in eastern and south-eastern Australia and the Wholesale Energy Market (**WEM**) in Western Australia. AEMO also manages a variety of gas trading markets and infrastructure.
- 2.6. AEMO’s functions seek to promote the efficient investment in, and efficient use of, gas and electricity for the long-term interests of Australian consumers in relation to price, quality, safety, reliability and security.⁴
- 2.7. AEMO’s responsibilities include monitoring supply and demand, voltage and frequency and managing planned and unplanned outages and emergencies. AEMO manages the Gas Short Term Trading Market, the Gas Supply Hubs and Pipeline Capacity Trading, as well as retail markets in electricity and gas. To achieve this, AEMO monitors system performance and security and manages the essential services that support a secure electricity system, such as regulating balancing, frequency control, inertia and system strength, voltage management and system restart capabilities.⁵
- 2.8. Forecasting and modelling of potential (or developing) changes is critical to AEMO’s work. AEMO produces short-term, long-term and operational predictions of demand and supply, and provides information to market participants about forecast risks to supply. AEMO also assesses and plans for the impact that operational changes will have on the system, such as planned outages, the connection of new generators and gas supply levels.⁶
- 2.9. If an energy-related event or emergency were to occur, AEMO is responsible for restoring energy systems to a secure operating state as soon as is safely possible. AEMO are also responsible for coordination and management of emergency arrangements across the NEM, WEM and gas markets in eastern and south-eastern Australia, including collaborating with governments, emergency services and energy industry participants during major disruptions of energy supply.⁷

⁴ AEMO, ‘What we do’, <https://aemo.com.au/about/what-we-do>.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

3. Consultation

Submissions before the draft determination

- 3.1. A public consultation process informs the ACCC's assessment of the likely public benefits and detriments from the Proposed Conduct.
- 3.2. The ACCC invited submissions from a range of potentially interested parties including major energy suppliers, customers, industry associations, consumer groups, state and federal government agencies and relevant regulatory bodies.
- 3.3. The ACCC received four submissions from interested parties in relation to the application. These submissions were from the Public Interest Advocacy Centre (**PIAC**), ATCO, the Australian Energy Council, and the Consumers' Federation of Australia.
- 3.4. The submissions generally support the granting of authorisation. However, some parties note that the ACCC should be cautious of authorising the Proposed Conduct for the requested 12 months due to the success Australia has had in managing the COVID-19 pandemic and suggested authorisation only continue for six months. Some interested parties also suggested that authorisation should only be provided for the conduct permitted by the 17 April 2020 interim authorisation.
- 3.5. As noted at paragraph 2.4, AEMO amended the application for authorisation to narrow the forms of cooperation for which it is seeking authorisation to what is now the Proposed Conduct, after interested party submissions had been provided.
- 3.6. Public submissions by AEMO and interested parties are on the Public Register for this matter.

Submissions after the draft determination

- 3.7. On 24 July 2020, the ACCC issued a draft determination proposing to grant authorisation until 31 March 2021. A pre-decision conference was not requested following the draft determination.
- 3.8. The ACCC received two submissions from interested parties in relation to the draft determination. These submissions were from the PIAC and Stanwell and support authorisation, providing comments as to how long they consider authorisation should operate. The submissions from the PIAC and Stanwell regarding the length of authorisation are summarised at 4.48, below. PIAC also submits that any cost savings realised by participating businesses should be passed on to consumers.
- 3.9. AEMO also provided a submission responding to the draft determination in which it requests that authorisation extend to 31 May 2021 and confirms that it is content not to maintain its request for a 12 month period of authorisation at this stage. AEMO's submissions regarding the length of authorisation are summarised at 4.48, below.

4. ACCC assessment

- 4.1. The ACCC's assessment of the Proposed Conduct is carried out in accordance with the relevant authorisation test contained in the Act.
- 4.2. AEMO seeks authorisation for Proposed Conduct that would or might constitute a cartel provision within the meaning of Division 1 of Part IV of the Act and may substantially lessen competition within the meaning of section 45 of the Act. Consistent

with subsection 90(7) and 90(8) of the Act, the ACCC must not grant authorisation unless it is satisfied, in all the circumstances, that the conduct would result or be likely to result in a benefit to the public, and the benefit would outweigh the detriment to the public that would be likely to result (authorisation test).

Relevant areas of Competition

- 4.3. To assess the likely effect of the Proposed Conduct, the ACCC identifies the relevant areas of competition likely to be impacted.
- 4.4. AEMO submits that the Participants compete in relation to the generation, transmission, transportation and/or supply of electricity and gas in Australia.
- 4.5. The ACCC agrees that the relevant areas of competition are likely to be, separately, the generation, transmission, and supply of electricity in Australia; and the extraction, transportation and supply of gas in Australia. Input markets to these supply chains, including for services such as maintenance, are also likely to be relevant to the Proposed Conduct.

Future with and without the Proposed Conduct

- 4.6. In applying the authorisation test, the ACCC compares the likely future with the Proposed Conduct that is the subject of the authorisation to the likely future in which the Proposed Conduct does not occur.
- 4.7. AEMO submits that in the future without the Proposed Conduct, Participants may be unable to coordinate certain activities in order to ensure the safe, secure and reliable supply of energy during the COVID-19 pandemic. AEMO further notes that although it has certain emergency powers to deal with immediate threats to power system security and interruptions to supply, the existing emergency management arrangements may not be well suited to dealing with the needs of the current pandemic situation. AEMO submits that without authorisation its powers to intervene would not permit it and industry participants to pro-actively plan and coordinate their maintenance activities to minimise the risk of outages, unless there is an imminent threat to system security.
- 4.8. The ACCC considers that in the future without the Proposed Conduct, any COVID-19 related issues that arise in the energy system and that fall within the scope of the Proposed Conduct, would be managed to the best of AEMO's ability using its existing powers. AEMO may also liaise and negotiate with individual industry participants on a bilateral basis in order to achieve some degree of coordination, but any forward scheduling of maintenance could only be undertaken in response to an imminent threat to system security.
- 4.9. In the future with the Proposed Conduct, AEMO and industry participants will be able to coordinate to mitigate or resolve COVID-19 related issues in the energy system that fall within the scope of the Proposed Conduct. This coordination is beyond AEMO's existing powers and so will better allow a collective response to COVID-19 related issues in the system.

Public benefits

- 4.10. The Act does not define what constitutes a public benefit. The ACCC adopts a broad approach. This is consistent with the Australian Competition Tribunal (the **Tribunal**) which has stated that the term should be given its widest possible meaning, and includes:

*...anything of value to the community generally, any contribution to the aims pursued by society including as one of its principal elements ... the achievement of the economic goals of efficiency and progress.*⁸

4.11. The ACCC has considered the following public benefits:

- greater capacity to ensure the ongoing safety, security and/or reliability of Australian energy systems
- minimising costly delays to maintenance.

Greater capacity to ensure the ongoing safety, security and/or reliability of Australian energy systems

4.12. AEMO submits that the Proposed Conduct will help ensure the ongoing safety, security, and/or reliability of Australian energy systems and the integrity of wholesale markets during the COVID-19 pandemic. The supply of gas and electricity to consumers is essential, and disruptions to these services during the COVID-19 pandemic can have significant detrimental impacts for consumers, businesses and the economy.

4.13. AEMO considers the Proposed Conduct will improve the information available to it regarding the ongoing availability, performance and operation of energy industry participants, help to minimise any disruptions to energy supply (for example, by coordinating the scheduling of any repairs, maintenance and other works requiring outages) and improve its management of system stability.

4.14. AEMO submits that disruptions to energy supply could occur as a result of three factors:

- a) essential workers or contractors responsible for maintenance or repairs becoming unwell and/or being required to self-isolate as a result of COVID-19
- b) possible shortages in parts, equipment or other essential resources as a result of disruptions to local and global supply chains, and/or
- c) ongoing changes in demand for energy as a result of changed economic activity and lock-downs of cities and regional centres, which may have implications for system stability from a technical perspective.

4.15. AEMO also submits that the effects of the COVID-19 pandemic, including border restrictions and quarantine requirements, are likely to continue into spring and summer. AEMO notes that several energy participants have deferred their essential works to begin after March 2021 and considers that there is a material risk of power outages if these maintenance activities are not managed.

4.16. The ACCC considers that the Proposed Conduct will improve the ability for the Participants to respond to impacts of the COVID-19 pandemic on Australia's energy systems and markets. Should such impacts occur, AEMO will be able to convene relevant groups to quickly share critical information and, where necessary, collectively agree to specific responses. Such collective action is unlikely to be achieved absent the authorisation, or is unlikely to be achieved quickly as AEMO would need to work individually with relevant Participants.

⁸ Queensland Co-operative Milling Association Ltd (1976) ATPR 40-012 at 17,242; cited with approval in Re 7-Eleven Stores (1994) ATPR 41-357 at 42,677.

- 4.17. This enhanced capacity to respond to impacts of the pandemic reduces the potential for the COVID-19 pandemic to give rise to outages or other system security issues. Improvements to system security, safety and reliability flow onto economic benefits by avoiding outages for consumers and producers, and minimising damage to energy system infrastructure through system instability.
- 4.18. The ACCC therefore considers that the Proposed Conduct is likely to result in a public benefit in the form of providing greater capacity to ensure the ongoing safety, security and/or reliability of Australian energy systems.

Minimising costly delays to maintenance

- 4.19. Travel restrictions, border closures, and other impacts on production are likely to impact on critical maintenance activities in the energy system. Maintenance at facilities such as thermal generators can involve significant temporary workforces and highly specialised foreign labour. These workforces may not be available, or may be significantly restricted in their movements during the COVID-19 pandemic. Core components are often imported from specialised manufacturers, and these supply chains may be disrupted due to COVID-19.
- 4.20. The COVID-19 pandemic is likely to make maintenance activities more difficult to plan for, and has the potential to cause delays and extended outages at specific generators. Such delays or outages at specific generators would impose costs to those generators. These costs will likely be passed through to consumers.
- 4.21. The Proposed Conduct is likely to reduce the potential for COVID-19 to cause delays or extended outages at specific generators. Participants should be able to coordinate a maintenance schedule that minimises the potential for delays to cascade and create overlapping, expensive outages. Sharing information will better allow Participants to find relevant labour and components in the unique COVID-19 circumstances.
- 4.22. While in normal market conditions, the ACCC would generally take the view that competition between generators is likely to be superior in allocating maintenance labour and components, the COVID-19 pandemic may cause acute supply issues to such markets, such as forcing large teams of skilled labour to quarantine, or become sick, for extended periods of time. Given the potentially high cost of delays to maintenance, the ACCC considers that there is public benefit in minimising these costs during the pandemic.
- 4.23. AEMO and relevant Participants in Queensland and Victoria have been coordinating maintenance under the interim authorisation. Such activities reflect that there have been some COVID-19 related disruptions to maintenance plans.
- 4.24. An example of this public benefit during the interim authorisation (provided by AEMO) was when, through discussions held under the interim authorisation, one generator was able to quickly locate an alternative local supplier of a major part that would ordinarily be imported from Germany but was unavailable for importation due to COVID-19 pandemic related restrictions in Europe. This avoided an extended outage which was at risk of overlapping with other scheduled outages in the state, giving rise to risks of energy outages. The sharing of this information (which does not ordinarily occur, even through AEMO) caused other generators to consider their supply chains for their outages earlier than originally planned, to avoid the risk of delays for their outages.
- 4.25. The ACCC considers that the Proposed Conduct is likely to result in a public benefit in the form of minimising costly delays to maintenance.

ACCC conclusion on public benefit

4.26. The ACCC considers that the Proposed Conduct is likely to result in public benefits from providing greater capacity to ensure the ongoing safety, security and/or reliability of Australian energy systems, and from minimising costly delays to maintenance.

Public detriments

4.27. The Act does not define what constitutes a public detriment. The ACCC adopts a broad approach. This is consistent with the Tribunal which has defined it as:

...any impairment to the community generally, any harm or damage to the aims pursued by the society including as one of its principal elements the achievement of the goal of economic efficiency.⁹

4.28. The ACCC has considered the following public detriments:

- reduced competition in wholesale electricity markets
- reduced competition for maintenance services and other inputs.

Reduced competition in wholesale electricity markets

4.29. The ACCC considers that sharing commercially sensitive information regarding ongoing operations of facilities, including generators, could lessen competition in wholesale electricity markets.

4.30. The transparency afforded to Participants over the operations of their competitors could facilitate anti-competitive and inefficient behaviours. For example, the bidding behaviour of generators may change if they learn through the Proposed Conduct that a particular competitor's plant is suffering technical issues.

4.31. Such detriments may be increased through information asymmetries. Because the information that is shared under the Proposed Conduct may not otherwise be publicly available, Participants may be able to use market sensitive information to their advantage and to the disadvantage of non-participants. Where some businesses have access to more or better information than their rivals the resulting information asymmetry can act as a barrier to competition for the less informed business and have a distortionary effect on the market. For example, customers and aggregators on the demand-side may be less well informed about the precise details of planned plant outages than the generators involved in the Proposed Conduct. The result could be that businesses on the demand-side have less opportunity to anticipate and respond to strategic behaviour than the involved generators.

4.32. However, the ACCC considers that the risk of a lessening of competition occurring in wholesale electricity markets is limited for two reasons:

4.33. The Proposed Conduct does not involve entering into any contracts, arrangements or understandings regarding the wholesale price of energy; and

4.34. In relation to the concerns regarding asymmetric information, the Australian Energy Market Commission recently made a change to the National Electricity Rules to increase the transparency of information made available to Participants via the medium-term projected assessment of system adequacy (**MTPASA**) process.¹⁰ The

⁹ Re 7-Eleven Stores (1994) ATPR 41-357 at 42,683.

¹⁰ Australian Energy Market Commission, *Rule Determination, National Electricity Amendment (Improving Transparency and Extending Duration of MTPASA) Rule 2020, 20 February 2020*, available at:

new Rule provides for the publication of generator availability information at the individual participant and plant unit level. This would substantially reduce the degree of information asymmetry concerning planned outages between parties involved in the Proposed Conduct and those not involved. The new Rule took effect on 20 August 2020.

4.35. Potential risk is also limited by the Proposed Conduct stipulating that Participants are not able to conduct discussions or form agreements without the oversight of AEMO and a senior officer of the relevant state or territory government department with responsibility for energy (or their delegate) in attendance.

4.36. The ACCC considers that the Proposed Conduct may lead to detriments by reducing competition in wholesale electricity markets, but that such detriments are unlikely and would not persist long-term.

Reduced competition for maintenance services and other inputs

4.37. By allowing the Participants to coordinate their repairs and maintenance, the Proposed Conduct is likely to reduce competition for the supply of maintenance services.

4.38. A coordinated approach to maintenance may be less efficient in allocating service providers to the most valuable maintenance work, and may impact service provider revenue. Coordination may have similar impacts on markets for other inputs, such as components or non-maintenance related personnel.

4.39. The ACCC considers that the Proposed Conduct is likely to lessen competition for maintenance services and other inputs. However, as discussed previously, given the unique circumstances of the COVID-19 pandemic, the ACCC considers that coordination to minimise disruption to the system, or costly delays to generators is likely to give rise to public benefits.

ACCC conclusion on public detriment

4.40. The ACCC considers that the Proposed Conduct is likely to lead to some public detriment as a result of a lessening of competition in wholesale markets and for maintenance services and other inputs.

Balance of public benefit and detriment

4.41. The ACCC considers that the Proposed Conduct is likely to result in public benefits in the form of greater capacity to ensure the ongoing safety, security, and/or reliability of Australian energy systems, and minimise costly delays to maintenance.

4.42. The ACCC considers that the Proposed Conduct is likely to lead to some public detriment as a result of a lessening of competition in wholesale markets and for maintenance services and other inputs. However, the ACCC considers that the detriment resulting from coordination in respect of these services is offset by the public benefit that such coordination brings by reducing disruption to the system and costly delays to generators.

4.43. For the reasons outlined in this determination, and subject to the conditions, the ACCC is satisfied that the Proposed Conduct is likely to result in a public benefit and that this public benefit would outweigh any likely detriment to the public from the Proposed Conduct.

Length of authorisation

- 4.44. The Act allows the ACCC to grant authorisation for a limited period of time.¹¹ This enables the ACCC to be in a position to be satisfied that the likely public benefits will outweigh the detriments for the period of authorisation. It also enables the ACCC to review the authorisation, and the public benefits and detriments that have resulted, after an appropriate period.
- 4.45. AEMO initially sought authorisation for 12 months from the date of final determination. This would be until approximately 30 September 2021.
- 4.46. Before the ACCC issued its draft determination, the PIAC submitted that with restrictions across Australia being lifted (at the time of its submission) and in the absence of a severe second wave of infections, the types of disruptions that the Proposed Conduct seeks to overcome may no longer be material and the ACCC should consider a six month authorisation period rather than 12. This would be until approximately 31 March 2021.
- 4.47. The ACCC's draft determination, issued on 24 July 2020, proposed to grant conditional authorisation until 31 March 2021.
- 4.48. In response to the draft determination PIAC advised that they were supportive of authorising the Proposed Conduct until 31 March 2021, whereas Stanwell submitted that in light of the resurgence of COVID-19 in New South Wales and Victoria it considered it appropriate for authorisation to extend to 30 September 2021.
- 4.49. AEMO's submission responding to the draft determination requests that authorisation extend to 31 May 2021 because:
- a) The Stage 3 and Stage 4 lockdowns in Victoria confirm that serious risks remain for the foreseeable future. And the effects of the COVID-19 pandemic, including border restrictions and quarantine requirements, are likely to continue into spring and summer.
 - b) Restrictions imposed in response to the COVID-19 pandemic have already had a direct and material impact on the essential maintenance of infrastructure. In particular:
 - i) maintenance works have been deferred from the cooler months
 - ii) border closures and quarantine requirements have impaired the movement of specialist maintenance personnel
 - iii) on-site social distancing requirements, delays in receiving parts from overseas, self-isolation and COVID testing requirements for sick employees have caused delays and extensions to maintenance works
 - iv) a heightened risk of extended outages, in turn, increases the risk of outages overlapping with one another and can give rise to power outages.
 - c) Energy industry participants have deferred essential works as a result of the COVID-19 pandemic and AEMO has been able to facilitate discussions and cooperation allowing for the re-scheduling of these works. However, the extended summer period of high demand and extreme stress on the energy system is approaching, which will bring a heightened risk of breakdowns and power outages.

¹¹ Subsection 91(1)

- d) Many maintenance outages that would ordinarily have occurred by now have been postponed to the first feasible opportunity in 2021 – the post-summer period beginning after March 2021. AEMO considers there is a material risk of power outages if this concentration of outages is not managed in a manner similar to that undertaken under the interim authorisation to date.
 - e) Without authorisation, AEMO’s powers to intervene in relation to maintenance (including by directing that maintenance be rescheduled) is limited to circumstances where there is an imminent threat to system security and is unlikely to be triggered where AEMO and industry wish to pro-actively plan and coordinate their maintenance activities to minimise the risk of outages.
 - f) There has been a material change in circumstances since submissions on the Application were made in May 2020, with restrictions responding to the COVID-19 pandemic continuing to intensify.
- 4.50. The ACCC considers that COVID-19 related authorisations should only be in place so long as they are necessary. However, in light of recent outbreaks of COVID-19 in Australia and AEMO’s observation that there is currently concentration of scheduled maintenance activities from March 2021, the ACCC considers that a longer period of authorisation is appropriate.
- 4.51. The ACCC accordingly grants authorisation until 31 May 2021.

5. Determination

The application

- 5.1. On 30 March 2020, AEMO lodged application AA1000484 with the ACCC, seeking authorisation under subsection 88(1) of the Act. AEMO amended its application for authorisation on 16 July 2020.

The authorisation test

- 5.2. Under subsections 90(7) and 90(8) of the Act, the ACCC must not grant authorisation unless it is satisfied in all the circumstances that the Proposed Conduct is likely to result in a benefit to the public and the benefit would outweigh the detriment to the public that would be likely to result from the Proposed Conduct.
- 5.3. For the reasons outlined in this determination and subject to the conditions below, the ACCC is satisfied, in all the circumstances, that the Proposed Conduct would be likely to result in a benefit to the public and the benefit to the public would outweigh the detriment to the public that would result or be likely to result from the Proposed Conduct, including any lessening of competition.
- 5.4. Accordingly, subject to the conditions, the ACCC grants authorisation.

Conditions of authorisation

- 5.5. In its interim authorisations of 3 April, 17 April, and 24 July 2020 the ACCC imposed conditions that, in broad terms, required AEMO to regularly report to the ACCC how authorisation is being used, Participants to continue to comply with conditions imposed in related authorisations, and any agreements formed in reliance of the interim authorisation not to endure beyond the authorisation period.

- 5.6. The ACCC has also added a condition that would allow additional parties to be approved as 'Other Approved Participants' during the authorisation.
- 5.7. These conditions provide important transparency in relation to the conduct being undertaken under the interim authorisation, ensure that other (related) authorisations are not compromised and signal to Participants how appropriate agreements and arrangements should be structured. The ACCC considers that these mechanisms minimise the risk and extent of detriment, discussed above, and therefore has decided to retain conditions to this effect in the authorisation.
- 5.8. The ACCC grants authorisation subject to the following conditions:

Condition 1: Reporting Requirements

- 5.9. AEMO must comply with the attached Reporting and Communications Protocol (**Attachment A**).

Condition 2(a): WA and NT LNG producers

- 5.10. Where the Proposed Conduct involves the scheduling of maintenance at LNG facilities in WA or the NT, Disclosing Producers (as defined in **Attachment B**) must comply with Attachment B.

Condition 2(b): Queensland LNG producers

- 5.11. Where the Proposed Conduct involves the scheduling of maintenance at LNG facilities in Queensland, LNG Producers (as defined in **Attachment C**) must comply with Attachment C.

Condition 3: Agreements not to endure beyond authorisation period

- 5.12. Any contract, arrangement or understanding entered into in reliance on this authorisation must provide for its immediate termination (other than any provisions dealing with ongoing confidentiality obligations) upon the expiry or revocation of this authorisation.

Condition 4: Approval process for Other Approved Participants

- 5.13. The following process applies to any party (other than AEMO and AEMO Industry Participants) that wishes to obtain the protection of this conditional authorisation:
- a) AEMO must seek the approval of the ACCC by sending an email to adjudication@acc.gov.au, identifying the proposed party, including a description as to the conduct of that party, and (other than in respect of parties who have newly been registered or received an exemption in respect of an electricity or gas market or system operated or managed by AEMO) the reasons why such participation is desirable to achieve the purposes of the Proposed Conduct (set out in paragraphs 1.5 to 1.7 of this determination).
 - b) If the ACCC approves the party to engage in some or all of the conduct the subject of the notification, that party will receive the protection of this conditional authorisation, subject to any conditions imposed by the ACCC, from the time that AEMO is notified of the ACCC's decision.
 - c) When considering the inclusion of a proposed party, the ACCC may in its absolute discretion, refuse to approve the inclusion of the proposed party or impose conditions which restrict the type or extent of the Proposed Conduct in relation to the proposed party.

- d) Unless the ACCC approves the party, it will not have any protection under this conditional authorisation.
- 5.14. The ACCC may authorise a Committee or Division of the ACCC, a member of the ACCC or a member of the ACCC staff, to exercise a decision making function under the conditions of this authorisation on its behalf.

Conduct which the ACCC has decided to authorise

- 5.15. The ACCC grants conditional authorisation AA1000484 to enable the Participants to cooperate to ensure the ongoing safety, security, or reliability of Australian energy systems during the COVID-19 pandemic as described in paragraphs 1.5 to 1.8 and defined as the Proposed Conduct.
- 5.16. The ACCC grants authorisation in relation to Division 1 of Part IV of the Act and section 45 of the Act.
- 5.17. The ACCC has decided to grant authorisation AA1000484 until 31 March 2021.

6. Interim authorisation

- 6.1. AEMO requested interim authorisation for the Proposed Conduct, along with cooperating on deferring non-essential works, sharing information on gas availability, managing system stability, and any other conduct AEMO deems necessary and as notified to the ACCC.
- 6.2. On 3 April 2020, the ACCC granted interim authorisation under subsection 91(2) of the Act for a subset of the conduct. On 17 April 2020, the interim authorisation was revoked and a new interim authorisation issued to allow the Participants to engage in all of the conduct proposed by AEMO at that time, with the exception of sharing information regarding gas availability.¹² Both of these interim authorisations were subject to conditions.
- 6.3. On 16 July, AEMO wrote to the ACCC to narrow the scope of the conduct sought under authorisation to the Proposed Conduct and requested that the interim authorisation be varied to reflect the Proposed Conduct.
- 6.4. On 24 July 2020 the ACCC decided to revoke the 17 April 2020 interim authorisation, and grant a replacement conditional interim authorisation under subsection 91(2) of the Act to allow the Participants to engage in the Proposed Conduct. The interim authorisation was subject to conditions substantively similar to those described at paragraphs 5.9 to 5.12 of this Determination.
- 6.5. Interim authorisation will remain in place until the ACCC's final determination comes into effect or until the ACCC decides to revoke interim authorisation.

7. Date authorisation comes into effect

- 7.1. This determination is made on 17 September 2020. If no application for review of the determination is made to the Australian Competition Tribunal it will come into force on 9 October 2020.

¹² See ACCC Interim Authorisation Decision of 17 April 2020 available at <https://www.accc.gov.au/system/files/public-registers/documents/Interim%20Authorisation%20Decision%20-%2017.04.20%20-%20PR%20-%20AA1000484%20AEMO.pdf>.

Attachment A: Reporting and Communications Protocol

Australian Energy Market Operator (AEMO)

Application for authorisation AA1000484

Final Determination: 17 September 2020

Purpose

1. This is the Reporting and Communications Protocol referred to in condition 1 of the Final Determination granted by the ACCC on 17 September 2020 in respect of proposed arrangements between AEMO and certain gas and electricity industry participants for the purpose of dealing with the effects of the COVID-19 pandemic on Australia's energy systems (**Authorisation**).
2. Capitalised terms used but not defined in this document have the meaning given in the Final Determination.

AEMO's reporting commitments

3. While AEMO engages in conduct enabled by the Authorisation, AEMO will use its best endeavours to provide no later than the first Thursday of each month (or if not a business day in Sydney, on the next business day) a report to the ACCC setting out each material contract, arrangement, understanding or decision made by AEMO and AEMO Industry Participants (and any Other Approved Participants) in the previous month that involves the Proposed Conduct, including:
 - a) the dates of all material decisions, contracts, arrangements or understandings formed that rely on the Authorisation,
 - b) the parties to each material decision, contract, arrangement or understanding formed that rely on the Authorisation,
 - c) what topics were discussed at meetings where those material decisions, contracts, arrangements or understandings were formed, and/or the material content of those contracts, arrangements, understandings or decisions, including key details such as the relevant products or services, quantities, timings, and financial or other compensation,
 - d) a description of the issues arising from the COVID-19 pandemic that the relevant decision, contract, arrangement or understanding seeks to address and how it will be addressed,
 - e) all material decisions, contracts, arrangements or understandings referred to in the AEMO update to Energy Coordination Mechanism meetings, and
 - f) where possible a non-confidential version of the report for publication on the public register.

Information requested and concerns raised by the ACCC

4. The ACCC may request additional information regarding conduct enabled by the Authorisation. AEMO, any AEMO Industry Participant and any Other Approved Participant must promptly provide any further information requested by the ACCC.
5. An ACCC representative may elect to attend any meeting or call where it is intended that material decisions, contracts, arrangements or understandings may be formed as an observer for the purpose of observing that the relevant conduct of those groups which might give rise to concerns under Part IV of the CCA notwithstanding the Authorisation granted on 17 September 2020. Where reasonably practicable, AEMO will provide the ACCC with advance notice as soon as is reasonably practicable of any meetings or calls (including recurring meetings and ad hoc meetings) where material decisions, contracts, arrangements or understandings are expected to be formed, proposed or discussed. The ACCC will give AEMO advance notice of its proposed representative at the relevant meeting or call.
6. Any notice or request for information under paragraphs 4 to 5 should be provided to the contact person nominated by AEMO for the purposes of this Reporting Protocol.

Confidentiality

7. Unless stated otherwise, AEMO asks that the ACCC receive any information provided under this Reporting Protocol on a confidential basis in accordance with the ACCC's statutory obligations on the basis set out below:
 - a. there is no restriction on the internal use, including future use, that the ACCC may make of the information consistent with its statutory functions;
 - b. the confidential information may be disclosed to the ACCC's external advisors and consultants on condition that each such advisor or consultant is informed of the obligation to treat the information as confidential; and
 - c. the ACCC may disclose the confidential information to third parties (in addition to its external advisors or consultants) if compelled by law or in accordance with section 155AAA of the CCA.
8. Nothing in paragraph 7 limits AEMO's obligations under paragraph 3 above.

Attachment B:

Disclosure requirements on WA and NT LNG producers

Definitions:

WA and NT LNG Maintenance Activities means where Chevron Australia Pty Ltd (**Chevron**), Inpex Operations Australia Pty Ltd (**Inpex**), Shell Australia Pty Ltd (**Shell**) and/or Woodside Energy Limited (**Woodside**):

- a) make and give effect to arrangements or understandings among the applicants regarding the sequencing and timing of the conduct of scheduled maintenance at the facilities which support LNG production, including the sequencing and timing of shutdowns and partial plant outages associated with such maintenance by:
 - i. identifying the maintenance requirements for each of the facilities which support LNG production, including the scope and expected duration of maintenance campaigns and any shutdowns or partial plant outages associated with those maintenance campaigns;
 - ii. classifying planned maintenance campaigns (e.g. major/minor shutdown maintenance or campaign maintenance);
 - iii. working to identify optimal maintenance windows having regard to factors such as climate, safety considerations and resource constraints;
 - iv. scheduling maintenance in such a way as to minimise contractor mobilisation and demobilisation costs;
 - v. developing a process to:
 - A. nominate preferred dates for planned maintenance;
 - B. negotiate and agree the proposed dates for planned maintenance at each of the facilities supporting LNG production;
 - C. inform one another of ad hoc unplanned maintenance requirements;
 - D. consult about variations to any maintenance dates;
 - E. resolve conflicts where maintenance dates overlap; and
 - F. prepare and agree a schedule recording the planned maintenance dates for relevant facilities; and
- b) exchange information for the purpose of making and giving effect to the arrangements and understandings referred to in paragraph (a), including information about:
 - i. maintenance techniques, safety practices and operational processes, including personnel requirements, specialist equipment and the use, storage, transport and disposal of hazardous chemicals;
 - ii. potential resource constraints associated with particular maintenance windows (e.g. transport and accommodation) and discussing mitigation options; and
 - iii. disclosing the names of the maintenance contractors who have been appointed by each party to perform the relevant maintenance, subject to applicable third party confidentiality restrictions

Requirements:

1. The purpose of this condition is to make publicly available any "Maintenance Information" (as defined in paragraph 2, below) that Chevron, INPEX and/or Woodside (each a '**Disclosing Producer**') disclose to another Disclosing Producer or Shell in the course of scheduling maintenance activities for LNG facilities in Western Australia and/or the Northern Territory as part of WA and NT LNG Maintenance Activities
2. Each Disclosing Producer must publish the following information (**Maintenance Information**):
 - a. the Disclosing Producer's reasonable expectation of the dates when the Scheduled Maintenance Activities (as defined in paragraph 4) will commence and conclude;
 - b. whether the Scheduled Maintenance Activities are expected to involve any of the following:
 - i. Shutdown of one half or less of an LNG train;
 - ii. Shutdown of greater than one half of an LNG train but not greater than one LNG train;
 - iii. Shutdown of greater than one LNG train but not greater than one and a half LNG trains;
 - iv. Shutdown of greater than one and a half of an LNG train but not greater than two LNG trains;
 - v. Shutdown of greater than two LNG trains but not greater than two and a half LNG trains;
 - vi. Shutdown of greater than two and a half LNG trains but not greater than three LNG trains;
 - vii. Shutdown of greater than three LNG trains but not greater than three and a half LNG trains;
 - viii. Shutdown of greater than three and a half LNG trains but not greater than four LNG trains;
 - ix. Shutdown of greater than four LNG trains but not greater than four and a half LNG trains; or
 - x. Shutdown of greater than four and a half LNG trains,

where such Maintenance Information has been disclosed by a Disclosing Producer to another Disclosing Producer or to Shell pursuant to the Authorisation as soon as is practicable after, but within 2 business days of, the disclosure. For the avoidance of doubt, the information to be published pursuant to this paragraph does not include preliminary discussions between Disclosing Producers and Shell for the purpose of determining possible dates for Scheduled Maintenance Activities.

3. For the purposes of this requirement of publication, a Disclosing Producer will reasonably expect the occurrence of Scheduled Maintenance Activities when the Disclosing Producer has undertaken sufficient planning to define the scope of the shutdown of one or more of its LNG trains (including any partial shutdowns) associated with the Scheduled Maintenance Activities and has confirmed the availability of contractors for the proposed shutdown period.

4. For the purposes of this requirement of publication, Scheduled Maintenance Activities means the performance of scheduled maintenance activities at an LNG facility:
 - a. involving the complete or partial shutdown of an LNG train; and
 - b. where the shutdown is expected to have a duration of a minimum of 1 day.
5. The Disclosing Producer will satisfy the publication requirement under paragraph 2 if it publishes the Maintenance Information on its internet website in a manner that is easily accessible to interested parties.
6. It is acknowledged that the Maintenance Information published by the Disclosing Producer may be subject to change for a number of operational or commercial reasons. The provision of the Maintenance Information by the Disclosing Producer may be made subject to the following disclaimer:

"[insert name of Disclosing Producer] provides the Maintenance Information on the basis that the information:

 - *is provided in good faith and is published as a condition of the Authorisation granted by the ACCC; and*
 - *is based on [insert name of Disclosing Producer]'s reasonable expectations and is subject to change."*
7. Each Disclosing Producer must, as soon as is practicable, amend and/or update its published Maintenance Information as necessary to ensure that the published Maintenance Information continues to accurately reflect the Disclosing Producer's reasonable expectations about Scheduled Maintenance Activities.
8. The Disclosing Producers must comply with the requirements in paragraphs 2 and 7 unless and until:
 - a. they are required to publish the Maintenance Information or information substantially the same as the Maintenance Information in compliance with another statutory or regulatory obligation including, but not limited to, an obligation of publication arising under the National Gas Law or the National Gas Rules (or any regulation, rule, procedure or instrument made thereunder) and:
 - i. one or more Disclosing Producers have notified the ACCC, in writing, of the relevant statutory or regulatory obligation, including details of the publication requirement; and
 - ii. the ACCC has advised, in writing, that the publication requirements in paragraphs 2 and 7 no longer apply; or
 - b. the ACCC has otherwise advised, in writing, that the requirements in paragraphs 2 and 7 no longer apply.

Attachment C:

Disclosure requirements on Queensland LNG producers

Definitions:

LNG Facilities means liquefied natural gas (LNG) facilities on Curtis Island, near Gladstone, Queensland

Curtis Island Maintenance Activities means any situation where Australia Pacific LNG Pty Ltd, Queensland Curtis LNG Project, and Gladstone LNG:

- a) Make and give effect to arrangements or understandings among the Applicants regarding the sequencing and timing of the conduct of scheduled maintenance at the LNG facilities, including the sequencing and timing of shutdowns and partial plant outages associated with such maintenance by:
 1. Identifying the maintenance requirements for each of the LNG facilities, including the scope and expected duration of maintenance campaigns and any shutdowns or partial plant outages associated with those maintenance campaigns
 2. Classifying maintenance campaigns (e.g. major and minor)
 3. Working to identify optimal maintenance windows having regard to factors such as climate, safety considerations and local resource constraints
 4. Scheduling maintenance in such a way as to minimise contractor mobilisation and demobilisation
 5. Developing a process to:
 - i. Nominate preferred dates for planned maintenance
 - ii. Negotiate and agree the proposed dates for planned maintenance at each of the LNG facilities
 - iii. Inform one another of ad hoc unplanned maintenance requirements
 - iv. Consult about variations to any maintenance dates
 - v. Resolve conflicts where maintenance dates overlap
 - vi. Prepare and agree a schedule recording the planned maintenance dates for each LNG facility.
- b) Exchange information for the purpose of making and giving effect to the arrangements and understandings referred to in paragraph a) – including information about:
 1. Maintenance techniques and operational processes, including personnel requirements, specialist equipment and the use, storage, and transport and disposal of hazardous chemicals
 2. Potential resource constraints associated with particular shutdown windows (e.g. accommodation) and discussing mitigation options
 3. Disclosing the names of the maintenance contractors who have been appointed by each of the Applicants to perform the relevant LNG facility maintenance, subject to applicable third party confidentiality restrictions.

Requirements:

1. The purpose of this condition is to make publicly available any "Maintenance Information" (as defined in paragraph 2, below) that an LNG producer the subject of this condition (an **LNG Producer**) discloses to another LNG Producer in the course of Curtis Island Maintenance Activities.
2. Each LNG Producer must publish the following information (**Maintenance Information**):
 - (a) the LNG Producer's reasonable expectation of the dates when the Scheduled Maintenance Activities (as defined in paragraph 4) will commence and conclude;
 - (b) whether the Scheduled Maintenance Activities are expected to involve any of the following:
 - (i) Shutdown of one half or less of an LNG train;
 - (ii) Shutdown of greater than one half of an LNG train but not greater than one LNG train;
 - (iii) Shutdown of greater than one LNG train but not greater than one and a half LNG trains; or
 - (iv) Shutdown of greater than one and a half LNG trains

where such Maintenance Information has been disclosed by an LNG Producer to another LNG Producer pursuant to the Authorisation as soon as is practicable after, but within 2 business days of, the disclosure to the other LNG Producer(s). For the avoidance of doubt, the information to be published pursuant to this paragraph does not include preliminary discussions between LNG Producers for the purpose of determining possible dates for Scheduled Maintenance Activities.

3. For the purposes of this requirement of publication, an LNG Producer will reasonably expect the occurrence of Scheduled Maintenance Activities when the LNG Producer has undertaken sufficient planning to define the scope of the shutdown of one or more of its LNG trains (including any partial shutdowns) associated with the Scheduled Maintenance Activities and has confirmed the availability of contractors for the proposed shutdown period.
4. For the purposes of this requirement of publication, **Scheduled Maintenance Activities** means the performance of scheduled maintenance activities at an LNG Facility:
 - (a) involving the complete or partial shutdown of an LNG train; and
 - (b) where the shutdown is expected to have a duration of a minimum of 1 day.
5. The LNG Producer will satisfy the publication requirement under paragraph 2 if it:
 - (a) provides the Maintenance Information to the Australian Energy Market Operator (AEMO) who accepts receipt of the Maintenance Information and publishes it on the Natural Gas Services Bulletin Board (Bulletin Board) or similar publication; or
 - (b) if the Maintenance Information is not able to be published on the Bulletin Board, publishes the Maintenance Information on its internet website in a manner that is easily accessible to interested parties.
6. It is acknowledged that the Maintenance Information published by the LNG Producer may be subject to change for a number of operational or commercial reasons. The

provision of the Maintenance Information by the LNG Producer may be made subject to the following disclaimer:

"[insert name of LNG Producer] provides the Maintenance Information on the basis that the information:

- *is provided in good faith and is published as a condition of the Authorisation granted by the ACCC; and*
- *is based on [insert name of LNG Producer]'s reasonable expectations and is subject to change."*

7. Each LNG Producer must, as soon as is practicable, amend and/or update its published Maintenance Information as necessary to ensure that the published Maintenance Information continues to accurately reflect the LNG Producer's reasonable expectations about Scheduled Maintenance Activities.
8. The LNG Producers must comply with the requirements in paragraphs 2 and 7 unless and until:
 - (a) they are required to publish the Maintenance Information or information substantially the same as the Maintenance Information in compliance with another statutory or regulatory obligation including, but not limited to, an obligation of publication arising under the National Gas Law or the National Gas Rules (or any regulation, rule, procedure or instrument made thereunder) and:
 - (i) one or more LNG Producers have notified the ACCC, in writing, of the relevant statutory or regulatory obligation, including details of the publication requirement; and
 - (ii) the ACCC has advised, in writing, that the publication requirements in paragraphs 2 and 7 no longer apply; or
 - (b) the ACCC has otherwise advised, in writing, that the requirements in paragraphs 2 and 7 no longer apply.

Attachment D:

AEMO Industry Participants

Participants registered in the NEM

Participant	ABN / ACN
1st Energy Pty Ltd	71 604 999 706
Acciona Solar Pty Ltd	53 618 445 177
Active Stream Pty Ltd	32 603 459 267
Acumen Metering Pty Ltd	69 105 423 541
Adani Infrastructure Pty Ltd	16 606 764 827
Adelaide Brighton Cement Limited	96 007 870 199
AETV Pty Ltd	29 123 391 613
AGL Hydro Partnership	86 076 691 481
AGL Loy Yang Marketing Pty Ltd	19 105 758 316
AGL Macquarie Pty Limited	18 167 859 494
AGL PARF NSW Pty Ltd	33 615 408 770
AGL PARF Qld Pty Limited	94 619 439 226
AGL SA Generation Pty Limited	84 081 074 204
AGL Sales (Queensland Electricity) Pty Limited	66 078 875 902
AGL Sales Pty Limited	88 090 538 337
AGL South Australia Pty Ltd	49 091 105 092
Alcoa of Australia Limited	93 004 879 298
Alcoa Portland of Australia Pty Ltd	80 006 306 752
Alinta Energy Cea Trading Pty Ltd	54 605 450 271
Alinta Energy Retail Sales Pty Ltd	22 149 658 300
Alinta Sales Pty Ltd	92 089 531 984
Amalgamated Energy Services Pty Ltd	35 636 036 676
Amaysim Energy Pty Ltd	41 116 567 492
Anglo Coal (CapCoal Management) Pty Limited	73 010 037 564
Anglo Coal (Moranbah North Management) Pty Limited	14 069 603 587
APT Pipelines Limited	89 009 666 700
Ararat Wind Farm Pty Ltd	86 158 062 358
Arcadia Energy Trading Pty Ltd	31 121 803 638
Argyle Solar Farm Pty Ltd	68 624 521 848
ARP Australian Solar Pty Ltd	55 621 156 170
Arrow Energy Trading Pty Ltd	68 139 053 133
Atherton Solar Farm Pty Ltd	625 266 033
Attunga Capital Pty Ltd	96 117 683 093
Aurora Energy (Tamar Valley) Pty Ltd trading as AETV Power	29 123 391 613
Aurora Energy Pty Ltd	85 082 464 622
Ausgrid Operator Partnership (trading as Ausgrid) a partnership carried out under that name by:	
- Blue Op Partner Pty Ltd ACN 615 217 500 as trustee for the Blue Op Partner Trust	78 508 211 731
- ERIC Alpha Operator Corporation 1 Pty Ltd ACN 612 975 096 as trustee for	

the ERIC Alpha Operator Trust 1	
- ERIC Alpha Operator Corporation 2 Pty Ltd ACN 612 975 121 as trustee for the ERIC Alpha Operator Trust 2	
- ERIC Alpha Operator Corporation 3 Pty Ltd ACN 612 975 185 as trustee for the ERIC Alpha Operator Trust 3	
- ERIC Alpha Operator Corporation 4 Pty Ltd ACN 612 975 210 as trustee for the ERIC Alpha Operator Trust 4	
AusNet Electricity Services Pty Ltd	91 064 651 118
AusNet Transmission Group Pty Ltd	78 079 798 173
Australia and New Zealand Bank Group Limited	11 005 357 522
Australia Continental Energy Pty Ltd	72 142 956 616
Australia Energy Wind Farm Pty Ltd	25 614 608 454
Australia Plains Solar Project Pty Ltd	632 922 153
Balance Commodities and Energy Pty Ltd	18 623 247 003
Bald Hills Wind Farm Pty Ltd	13 117 264 712
Barunggam Solar Farms Pty Ltd	56 624 634 395
Basslink Pty Ltd	52 090 996 231
BayWa r.e. Wind Pty Ltd	51 606 343 757
BE Pro J Pty Ltd	17 624 192 338
Blue NRG Pty Ltd	30 151 014 658
Blue Pacific Energy Pty Ltd	37 628 273 656
Boco Rock Wind Farm Pty Ltd	49 137 886 750
Bodangora Wind Farm Pty Limited	79 134 443 904
Boer Energy (Australia) Pty Ltd	38 625 253 090
Bomen Solar Farm Pty Ltd (ACN 620 832 108) as trustee for Bomen SF Trust	67 363 258 504
Bookaar Renewables Pty Ltd	45 615 475 244
Bordstrong Developments Pty Ltd (Trading as Solar Q)	47 613 208 414
BP Energy Asia Private Limited	77 549 205 033
Braemar Power Project Pty Ltd	54 113 386 600
Bright Spark Power Pty Ltd	54 622 864 984
Broadsound Solar Farm Pty Ltd	15 620 028 097
Bulgana Wind Farm Pty Ltd	162 201 569
Bungama Solar 1 Pty Ltd	84 621 450 762
Bungama Solar 2 Pty Ltd	35 621 450 995
Callide Power Trading Pty Limited	80 082 468 719
Canadian Solar (Australia) Pty Limited	61 149 125 020
Canunda Power Pty Ltd	31 103 087 341
Cape Byron Management Pty Ltd	26 165 320 445
Capricorn SF No1 Pty Ltd	36 611 727 765
Castleton Commodities Merchant Asia Co Pte Ltd	153 463 846
Cathedral Rocks Wind Farm Pty Ltd	87 107 113 708
Cherry Tree Wind Farm Pty Ltd as trustee for The Cherry Tree Project trust	19 446 997 168
Childers Solar Farm Pty Ltd	70 609 374 058
CitiPower Pty Ltd	76 064 651 056
CKI Utilities Development Limited, PAI Utilities Development Limited, Spark Infrastructure SA (NO3) PTY Limited, Spark Infrastructure SA (NO1) PTY Limited, Spark Infrastructure SA (NO2) PTY Limited (SA Power Networks)	13 332 330 749
Clare Solar Farm Pty Ltd	78 611 346 859

Clean Energy Transfer Fund Investments Pty Ltd as Trustee for the Clean Energy Transfer Fund	32 523 323 511
Clean Technology Partners Pty Ltd	19 149 191 337
CleanCo Queensland Limited	85 628 008 159
Cleangen Power Pty Ltd	61 161 065 283
CleanTech Energy Pty Ltd	26 603 595 704
Clermont Asset Co Pty Ltd (ACN 623 155 573) as Trustee for the Clermont Solar Unit Trust	99 167 685 924
Cocamba Stage One Project Pty Ltd (ACN 631 975 436) as trustee for Cocamba Stage One Project Trust	58 614 700 570
Cocamba Stage One Project Pty Ltd (ACN 631 975 436) as trustee for Cocamba Stage One Project Trust	22 627 706 594
Coleambally Solar Pty Ltd	91 618 341 209
Colt Energy Pty Ltd	82 627 911 335
Comet Solar Farm Pty Ltd	72 618 108 286
Commonwealth Bank of Australia	48 123 123 124
Coonooer Bridge Wind Farm Pty Ltd	35 160 665 485
Corop Solar Farm Pty Ltd	45 631 987 990
Covau Pty Limited	54 090 117 730
COzero Energy Retail Pty Ltd	85 165 155 966
Crookwell Development Pty Ltd	53 106 800 480
CS Energy Limited	54 078 848 745
CSR Building Products Limited	55 008 631 356
Cullerin Range Wind Farm Pty Ltd	38 126 197 126
CuString Pty Ltd	47 137 531 054
Danske Commodities Australia Pty Ltd	52 621 320 581
Darling Downs Solar Farm Pty Ltd	35 611 319 003
Darlington Point Solar Farm Pty Ltd	54 615 736 984
Daydream Solar Farm Pty Ltd ATF the Daydream Solar Farm Trust	94 334 622 922
Delburn Wind Farm Pty Ltd	61 614 090 130
Delta Electricity	75 162 696 335
Deutsche Bank AG	13 064 165 162
Diamond Energy Pty Ltd	97 107 516 334
Directlink (No. 1) Pty Limited ABN 85 085 123 468, Directlink (No. 2) Pty Limited ABN 87 095 439 222, and Directlink (No. 3) Pty Limited ABN 86 095 449 817 trading as Directlink Joint Venture.	16 779 340 889
Discover Energy Pty Ltd	20619204750
DP Energy Australia Pty Ltd	16 140 516 196
Dubbo Solar Hub Pty Ltd	81 615 225 968
Dundonnell Wind Farm Pty Ltd	17 133 651 019
Dysart 1 Pty Ltd	609 597 248
Dysart Solar Farm Pty Ltd	38 619 931 412
Ecogen Energy Pty Ltd	86 086 589 611
Edenvale Solar Park Pty Ltd	627 088 359
EDL (OCI) Pty Ltd	85 113 489 295
EDL (TT) Pty Limited	95 088 169 135
EDL CSM (QLD) Pty Ltd	48 098 224 269
EDL Group Operations Pty Ltd	39 055 555 416

EDL LFG (NSW) Pty Ltd	37 070 941 794
EDL LFG (QLD) Pty Ltd	21 071 089 579
EDL LFG (SA) Pty Ltd	21 055 640 321
EDL LFG (VIC) Pty Ltd	69 061 503 348
EDL Projects (Australia) Pty Ltd	37 084 776 616
EIWA Bundaberg Solar Pty Ltd	26 626 084 544
EIWA Karrabin Solar Pty Ltd	62 631 174 788
Elaine Windfarm Pty Ltd	31 127 338 827
Electrag Pty Ltd	42 115 459 848
ElectraNet Pty Limited	41 094 482 416
ElectraNet SA (Transmission Lessor Corporation)	62 442 362 946
Electricity in a Box Pty Ltd	74 140 547 226
Elliott Nevertire Solar Pty Ltd as Trustee for the Elliott Nevertire Trust	33 893 459 797
Elysian Energy Pty Ltd	85 617 526 333
Endeavour Energy	11 247 365 823
Endeavour Energy Network Operator Partnership:	
Edwards O Pty Limited (ACN 618 643 486) as trustee for Edwards O Trust;	
ERIC Epsilon Operator Corporation 1 Pty Ltd (ACN 617 221 735) as trustee for	
ERIC Epsilon Operator Trust 1;	
ERIC Epsilon Operator Corporation 2 Pty Ltd (ACN 617 221 744) as trustee for	618 643 486
ERIC Epsilon Operator Trust 2;	
ERIC Epsilon Operator Corporation 3 Pty Ltd (ACN 617 221 753) as trustee for	
ERIC Epsilon Operator Trust 3;	
ERIC Epsilon Operator Corporation 4 Pty Ltd (ACN 617 221 771) as trustee for	
ERIC Epsilon Operator Trust 4;	
Enel X Australia Pty Ltd	49 104 710 278
Energex Limited	40 078 849 055
Energy Locals Pty Ltd	23 606 408 879
Energy Pacific (Vic) Pty Ltd	18 063 543 984
Energy Services Management Pty Ltd	95 619 512 935
EnergyAustralia Pty Ltd	99 086 014 968
EnergyAustralia Yallourn Pty Ltd	47 065 325 224
Enerparc Australia Pty Ltd	46 622 182 469
Enertech PV Australia Pty Ltd	54 625 087 112
Engie Renewables Australia Pty Ltd	59 615 753 574
Enova Energy Pty Ltd	16 606 176 756
EnviroGen Pty Limited	95 088 169 135
EPC Technologies Pty Ltd	64 612 341 849
Epho Asset Management	22 168 630 546
Epoch Capital Pty Ltd	16 128 329 395
Epoch Energy Solutions Pty Ltd	22 621 651 321
Ergon Energy Corporation Limited	50 087 646 062
Ergon Energy Queensland Pty Ltd	11 121 177 802
ERM Power Retail Pty Ltd	87 126 175 460
ESCO Pacific Pty Ltd	77 608 790 085
Essential Energy	37 428 185 226
Everleigh Solar Park Pty Ltd	62 627 091 525
Far Northern Milling Pty Ltd	55 627 502 158

Ferguson Wind Farm Pty Ltd	94 608 631 321
Finley Solar Farm Pty Ltd (ABN 89 616 527 621) as trustee for the Finley Solar Trust	63 656 675 511
Firm Power Pty Ltd	18 631 500 519
First Solar (Australia) Pty Ltd	66 141 686 946
Flinders Operating Services Pty Ltd	36 094 130 837
Foresight Solar Australia Pty Ltd	19 611 378 584
Forest Wind Holdings Pty Ltd	73 628 955 028
Fraser Coast Solar Park Pty Ltd	94 634 420 527
FRV Services Australia Pty Ltd	60 151 469 662
FS NSW Project No 1 At Pty Ltd (ACN 621 215 969) as trustee for the FS NSW Project No 1 Asset Trust	64 652 826 541
GAIA Australia Pty Ltd	67 607 860 597
Gannawarra Solar Farm Pty Ltd	33 615 736 895
Genex (Solar) Pty Ltd	24 606 804 915
Genex Power Limited	18 152 098 854
Georgetown Hills Renewable Energy Pty Ltd as Trustee for Georgetown Hills Renewable Energy Trust	94 820 035 175
Glenellen Solar Farm Pty Ltd	54 619 967 636
Global Power Generation Australia Pty Ltd	74 130 542 031
Globird Energy Pty Ltd	68 600 285 827
Goldman Sachs Financial Markets Pty Ltd	16 107 084 640
Goldwind Australia Pty Ltd	32 140 108 390
Goonumbla Asset Co Pty Ltd (ACN 628 351 271) as The Trustee for Goonumbla Asset Trust	80 881 665 313
Granite Hills Wind Farm Pty Limited	20 612 210 303
Granville Harbour Operations Pty Ltd as The Trustee for Granville Harbour Operations Trust	30 200 530 013
Greentricity Pty Ltd	47 122 144 709
Gregadoo Solar Farm Pty Ltd	62 621 818 862
Grey Box Energy Field Pty Ltd	80 619 786 739
Griffith Solar Farm Pty Ltd	66 615 225 842
GSP Energy Pty Ltd	13 101 038 386
Gunning Wind Energy Developments Pty Ltd	28 145 164 478
GVCE Mooroopna Solar Pty Ltd	17 630 597 456
Hamilton Solar Farm Pty Ltd	83 615 737 098
Hanwha Energy Retail Australia Pty Ltd	82 630 397 214
Hartree Partners, LP	
Hayman Solar Farm Pty Ltd ATF the Hayman Solar Farm Trust	14 829 941 435
Hazelwood Power	40 924 759 557
Hornsedale Power Reserve Pty Ltd	79 619 311 983
Hornsedale Windfarm Pty Ltd	88 167 598 594
Hughenden Solar Pty Limited as trustee for Hughenden Solar Trust	49 156 463 317
Hunter Energy Pty Ltd	65 624 824 791
HWF1 Pty Ltd	20 603 414 151
HWF2 Pty Ltd	40 605 944 394
HWF3 Pty Ltd	49 610 776 068
Hydro Power Pty Limited	39 003 714 136

Hydro-Electric Corporation trading as Hydro Tasmania	48 072 377 158
Ib vogt GmbH	68 532 456 050
Icon Distribution Investments Limited and Jemena Networks (ACT) Pty Ltd Trading as Evoenergy	76 670 568 688
Icon Retail Investments Limited and AGL ACT Retail Investment Pty Ltd trading as ActewAGL Retail	46 221 314 841
Infigen Energy Holdings Pty Ltd	86 111 909 794
Infigen Energy Markets Pty Limited	47 128 696 097
Innogy Energy Marketing Australia Pty Ltd	27 634 863 782
IntelliHUB Pty Ltd	57 601 509 693
International Power (Energy) Pty Ltd	53 062 798 510
Investec Bank (Australia) Ltd	55 071 292 594
Iraak Sun Farm Pty Ltd	38 611 727 774
Ironbark Holdings Australia Pty Ltd	39 168 385 699
Jemalong Networks Pty Ltd	623 524 809
Jemena Electricity Networks (Vic) Ltd	82 064 651 083
Jindera Solar Farm Pty Ltd	98 623 377 453
Joule Logic Pty Ltd	95 145 948 492
juwi Renewable Energy Pty Ltd	42 159 228 145
Kennedy Energy Park Pty Ltd	81 605 095 298
Kerang Solar Plant Pty Ltd	61 607 331 117
Kerang Solar Power Pty Ltd	61 624 301 800
Kiata Wind Farm Pty Ltd	79 607 460 873
Koorangie Solar Farm Pty Ltd	620 098 464
KSF Project Nominees Pty Ltd as Trustee for the KSF Project Trust	47 321 661 744
Kyoto Energy Wind Scone Pty Ltd	41 144 582 525
Lake Bonney Wind Power Pty Ltd	48 104 654 837
Lakeland Solar & Storage Pty Limited	86 606 530 198
Lakeland Wind Farm Pty Ltd	92 618 427 900
Lal Lal Wind Farms Nom Co Pty Ltd	37 625 768 774
Landfill Operations Pty Ltd	18 603 300 358
LGI Limited	49 138 085 551
Lightsource Australia SPV 2 Pty Ltd	627 818 259
Limondale Sun Farm Pty Ltd	66 617 558 728
Lincoln Gap Wind Farm (Operations) Pty Ltd	73 164 355 195
Liquid Capital Australia Pty Ltd	59 105 963 479
Liverpool Range Wind Farm Pty Ltd	11 630 598 239
LMS Energy Pty Ltd	39 059 428 474
Locality Planning Energy Pty Ltd	15 148 958 061
Localvolts Pty Ltd	12 609 840 379
Luminous Energy Pty Ltd	79 608 985 379
Lumo Energy (NSW) Pty Ltd	92 121 155 011
Lumo Energy (QLD) Pty Ltd	63 114 356 642
Lumo Energy (SA) Pty Ltd	61 114 356 697
Lumo Energy Australia Pty Ltd	69 100 528 327
Lumo Generation SA Pty Ltd	87 115 291 042
M&C Energy Pty Ltd	16 104 501 091

M2 Energy Pty Ltd	15 123 155 840
Mackay Sugar Limited	12 057 463 671
Mackay Sugar Limited	11 009 658 708
Macquarie Bank Limited	46 008 583 542
Manildra Prop Pty Ltd as The Trustee for the Manildra Asset Trust	93 276 108 749
Marble Solar Pty Ltd	38 628 447 816
Melbourne Water Corporation	81 945 386 953
Meridian Finco Pty Limited	42 143 693 592
Metering Dynamics Pty Ltd	58 087 082 764
Metropolis Metering Assets Pty Ltd	53 116 717 321
Metz NewCo Pty Ltd	34 610 480 281
Millmerran Energy Trader Pty Ltd	23 084 923 973
Mirani Solar Farm Pty Ltd	615 329 845
Mojo Power Pty Ltd	85 604 909 837
Molong Operations Co Pty Ltd as Trustee for the Molong Operations Trust	89 580 081 061
Momentum Energy Pty Limited	42 100 569 159
Moree Solar Farm Pty Ltd	24 147 861 345
Morgan Solar Pty Ltd as trustee for the Morgan Solar Unit Trust	80 980 892 705
Mortlake South Wind Farm Pty Ltd	12 622 271 363
Mortons Lane Windfarm Pty Limited	37 126 367 600
MP Tableland Green Power Pty Ltd	17 614 688 694
Mt Gellibrand Wind Farm Pty Ltd	30 125 610 639
Mt Mercer WindFarm Pty Ltd	86 118 169 421
Mt Millar Wind Farm Pty Ltd	67 107 673 361
Mt Thorley Solar Pty Ltd	46 631 273 035
MTA Energy Pty Ltd	41 622 895 274
Mugga Lane Solar Park Pty Ltd	32 156 565 641
Munna Creek Solar Farm Pty Ltd	89 620 305 428
Murra Warra II Project Co Pty Ltd as Trustee for the Murra Warra II Project Trust	82 961 145 141
Murra Warra Project Co Pty Ltd	616 990 731
Murraylink Transmission Company Pty Ltd	42 089 875 605
Neighbourhood Energy Pty Ltd	97 109 118 578
New Gullen Range Wind Farm Pty Ltd	41 167 404 211
NewEn Australia Pty Ltd	98 103 702 405
NewGen Braemar 2 Partnership	27 245 692 985
Next Business Energy Pty Ltd	91 167 937 555
NovaPower Pty Ltd	44 119 925 334
NSW Electricity Networks Operations Pty Ltd as a Trustee for the NSW Electricity Networks Operations Trust	70 250 995 390
Numurkah Solar Farm Pty Ltd	36 618 524 422
Oaky Creek Coal Pty Ltd	17 010 202 936
OM Financial Limited	
OMPS Pty Ltd	22 160 259 174
OneSteel Manufacturing Pty Limited	42 004 651 325
Online Power and Gas Pty Ltd	95 164 285 634
Onsite Energy Solutions Pty Ltd	92 164 385 693

Origin Energy Electricity Limited	33 071 052 287
Origin Energy Metering Coordinator Pty Ltd	96 616 347 454
Origin Energy Uranquinty Power Pty Ltd	26 120 384 938
Overland Sun Farming Pty Ltd	76 150 464 001
OVO Energy Pty Ltd	99 623 475 089
Oxley Solar Development Pty Ltd	15 629 954 329
Oz Minerals Limited	40 005 482 824
OzGen Retail Pty Ltd	22 129 658 206
Pacific Energy (Victorian Hydro) Pty Ltd	86 004 474 186
Pacific Hydro Chalicum Hills Pty Ltd	88 101 989 744
Pacific Hydro Clements Gap Pty Ltd	87 109 911 097
Pacific Hydro Crowlands Pty Ltd	19 620 640 486
Pacific Hydro Haughton Solar Farm Pty Ltd	31 617 201 653
Pacific Hydro Investments Pty Ltd	18 053 747 407
Pacific Hydro Portland Wind Farm Pty Ltd	75 103 162 474
Pacific Hydro Yaloak South Pty Ltd	11 612 249 671
Pangea Energy Pty Ltd	15 613 559 470
Parkes Solar Farm Pty Ltd	24 615 225 664
Pelican Point Power Limited	11 086 411 814
People Energy	20 159 727 401
Pioneer Sugar Mills Pty Ltd	63 009 889 856
Pirie Solar Farm Pty Ltd	77 624 758 425
PLUS ES	30 179 420 673
Pooled Energy Pty Ltd	31 163 873 078
Port Adelaide Energy Pty Ltd	83 105 607 538
Power Club Limited	71 603 346 836
Powercor Australia Ltd	89 064 651 109
Powerdirect Pty Ltd	28 067 609 803
Powerlink Queensland (Queensland Electricity Transmission Corporation Ltd)	82 078 849 233
Powermetric Metering Pty Ltd	89 131 072 707
Powershop Australia Pty Limited	41 154 914 075
Progressive Green Pty Ltd	27 130 175 343
Progressive Renewable Developments Goondiwindi Pty Ltd	21 629 560 621
Pumped Hydro (SA) Pty Ltd	11 617 761 743
Pyrenees Wind Energy Development Pty Ltd	31 097 047 268
Qenergy Limited	58 120 124 101
QGC Sales Qld Pty Ltd	80 120 323 588
Queensland Bulk Water Supply Authority (trading as Seqwater)	75 450 239 876
Reach Solar Energy Management Company Pty Limited	40 608 853 989
ReAmped Energy Pty Ltd	21 605 682 684
Red Energy Pty Limited	60 107 479 372
Renew Power Group Pty Ltd	74 615 045 237
Renewable Power Australia Limited	14 158 240 192
RES Australia Pty Ltd	55 106 637 754
Rifle Butts Wind Farm Pty Ltd	83 614 265 253
Rio Tinto Aluminium (Bell Bay) Limited	91 009 483 201

Rise Renewables Pty Ltd	53 621 541 348
Riverina Solar Farm Pty Ltd	28 611 245 704
Robertstown Solar 1 Pty Limited	37 621 450 940
Robertstown Solar 2 Pty Limited	91 621 451 161
Rodds Bay Solar Farm Pty Ltd	622 753 333
Rollingstone Solar Farm Pty Ltd	14 610 264 358
Ross River Operations Pty Ltd	616 327 827
Ross River Operations Pty Ltd as the Trustee for the Ross River Operations Trust	49 588 936 886
Royalla Solar Farm Pty Ltd	29 158 394 677
RTA Yarwun Pty Ltd	73 137 266 301
RWE Supply & Trading GmbH	
Rye Park Wind Farm Pty Ltd	11 153 598 586
Salt Creek Wind Farm Pty Ltd	94 121 087 492
Sanctuary Energy Pty Ltd	62 128 995 433
Santos NSW (Narrabri Power) Pty Ltd	42 104 570 943
Select Solutions Group Pty Ltd	73 097 962 395
SIMEC Zen Energy Retail Pty Ltd	54 615 751 052
Simec Zen Technologies (Power and Energy) Pty Ltd	82 110 224 005
Simply Energy	67 269 241 237
SmartestEnergy Australia Pty Ltd	37 632 313 029
Smithfield Power Generation Pty Ltd	45 616 835 682
Snowtown Wind Farm Pty Ltd	76 109 468 804
Snowtown Wind Farm Stage 2 Pty Ltd	85 155 626 252
Snowy Hydro Limited	17 090 574 431
Solar Reserve Australia II Pty Ltd	14 606 360 169
Solar River Projectco Pty Ltd (ACN 634 725 223) as trustee for the Solar River Project Trust No 1	42 253 459 301
South Australian Water Corporation	69 336 525 019
South Street Energy Pty Ltd	62 157 916 099
Spotless Facility Services Pty Ltd	83 072 293 880
Springdale Solar Farm Pty Limited	620 367 768
Stanwell Corporation Limited	37 078 848 674
Star of the South Wind Farm Pty Ltd as trustee for the Star of the South Trust	68 239 717 297
Starfish Hill Wind Farm Pty Ltd	54 099 761 261
Stockyard Hill Wind Farm Pty Ltd	71 118 119 501
Sumo Power Pty Ltd	86 601 199 151
Sun Farms Australia Pty Ltd	620 086 722
Sun Metals Corporation Pty Ltd	97 074 241 982
Sun Retail Pty Ltd	97 078 848 549
Sun Spot 2 Pty Ltd	618 128 671
Sun Spot 7 Pty Ltd	23 632 230 794
Sunraysia Emporium Pty Ltd	81 632 717 492
Sunraysia Solar Project Pty Ltd	75 612 072 536
Sunshine Energy Australia Pty Ltd	84 617 880 752
Susan River Solar Pty Ltd as Trustee for Susan River Solar Trust	75 778 423 009
SWF1 Operations Pty Ltd	601 425 316

Syncline Energy Pty Ltd	26 117 458 803
Synergen Power Pty Limited	66 092 560 819
Tango Energy Pty Ltd	43 155 908 839
Taralga Wind Farm Nominees No 2 Pty Ltd (ATF Taralga Wind Farm Operating Trust)	31 159 439 522
Tasmanian Irrigation Pty Ltd	95 722 799 075
Tasmanian Networks Pty Ltd	24 167 357 299
Teebar Clean Energy Pty Ltd	87 612 610 867
Telstra Energy (Generation) Pty Ltd	32 613 554 233
Terrain Solar Pty Ltd	13 616 856 172
The Trustee for Superman Energy Unit Trust	66 532 053 622
The Trustee for the SWF1 Operations Trust	34 830 863 882
Tibra Trading Pty Limited	42 117 881 759
Tilt Renewables Limited	55 613 749 616
Tilt Renewables Retail Pty Ltd	82 133 552 539
Tomago Aluminium Company Pty Ltd	68 001 862 228
Toora Wind Farm Pty Ltd	56 126 722 076
Total Eren Australia Pty Ltd	16 617 965 081
Total Gas & Power Asia Private Limited	71 161 771 286
Total Gas & Power Australia Pty Ltd	87 167 432 448
Transalta Energy (Australia) Pty Ltd	40 062 135 844
TransGrid Services Pty Ltd as Trustee for TransGrid Services Trust	94 121 353 950
Transmission Operations (Australia) 2 Pty Ltd	34 605 734 129
Transmission Operations (Australia) Pty Ltd	21 159 526 520
United Energy Distribution Pty Ltd	70 064 651 029
UPC Robbins Island Pty Ltd	35 618 734 277
Urth Energy Pty Ltd (Administrators Appointed)	52 601 693 109
Vector Advanced Metering Services (Australia) Pty Ltd trading as Elect Data Services	28 098 108 797
Vector International Pacific Pty Ltd as trustee for The Meehan Family Trust trading as VRT Systems	15 596 735 786
Vellocet Clean Energy Pty Ltd	57 613 368 040
Vena Energy Services (Australia) Pty Ltd	89 609 132 747
Venn Artibir Group Pty Ltd	42 632 214 674
Veolia Environmental Services (Australia) Pty Ltd	20 051 316 584
Vivienne Court Trading Pty Ltd	86 153 821 571
Walla Walla Solar Farm Pty Ltd	26 627 937 473
Wangaratta Solar Farm Pty Ltd	25 608 644 435
Waterloo Wind Farm Pty Ltd	87 113 160 731
Wemen Asset Co Pty Ltd as Trustee for Wemen Solar Unit Trust	76 874 996 133
Western Downs Solar Project Pty Ltd	45 618 515 174
Westpac Banking Corporation	33 007 457 141
WestWind Energy Pty Ltd	94 109 132 201
White Rock Wind Farm Pty Ltd	45 153 592 173
Whitsunday Solar Farm Pty Ltd	20 615 715 270
Wild Cattle Hill Pty Ltd	61 610 777 369
Willogoleche Power Pty Limited	22 112 307 589

Wilmar Sugar Pty Ltd	44 081 051 792
Windlab Systems Pty Ltd	26 104 461 958
Windy Hill Wind Farm Pty Ltd	60 126 722 094
WINenergy Pty Ltd	71 112 175 710
Winton Asset Co Pty Ltd	31 623 824 288
Wodonga Solar Power Pty Ltd	90 622 199 240
Wollar Solar Development Pty Ltd	88 621 969 266
Woodlawn Wind Pty Ltd	38 139 165 610
Woolsthorpe Wind Farm Pty Ltd	104 022 237
X-Elio Australia Pty Ltd	42 617 094 863
Y.E.S. (Aust) Pty Ltd trading as Yates Electrical Services	22 134 318 924
Y.E.S. Energy (SA) Pty Ltd	22 627 706 594
Yarranlea Solar Pty Ltd	30 609 850 553
YD Projects Pty Ltd	50 156 004 732
Yendon Windfarm Pty Ltd	20 127 338 783
Yorke Peninsula WF Project Pty Ltd	15 138 965 901
ZAP Energy	92 618 444 910

NEM Exemptions

Exempt Party Name	ABN, ACN, ARBN
Adani Renewable Asset Holdings Pty Ltd	96 620 876 100
Adani Rugby Run Pty Ltd (ACN 620 965 755) as Trustee for the Adani Rugby Run Trust	15 181 730 931
AGL Barker Inlet Pty Ltd	37 622 351 660
AGL Energy Limited	74 115 061 375
AGL Energy Services (Queensland) Pty Ltd	80 104 759 417
AGL Energy Services Pty Ltd	57 074 821 720
AGL Hydro Partnership	86 076 691 481
AGL Loy Yang Pty Ltd	62 077 985 758
AGL LYP 1 Pty Ltd Pty Ltd	36 078 121 187
AGL LYP 14 B.V.	55 073 074 530
AGL LYP 2 Pty Ltd	078 377 572
AGL LYP 3 Pty Ltd	078 377 527
AGL Power Generation (VIC) Pty Ltd	
AGL Southern Hydro (NSW) Pty Limited	73 056 452 601
Alfred Health	27 318 956 319
Alinta DEBO	66 079 246 423
Alinta DEBP Pty Ltd	85 075 067 702
Alinta DVP Pty Ltd	083 051 978
Alinta Network Services Pty Ltd	52 104 352 650
APA Operations (EII) Pty Limited	69 134 460 496
APT Petroleum Pipelines Holdings Pty Ltd	92 009 738 489
Arrow Energy Trading Pty Ltd	68 139 053 133
AusNet Transmission Group Pty Ltd	78 079 798 173
Australia and New Zealand Banking Group Limited	11 005 357 522
Australia Pacific Airports (Melbourne) Pty Limited	62 076 999 114
AWF Prop Co 2 Pty Ltd as trustee for AWF Prop Trust 2	61 446 383 749
Bald Hills Wind Farm Pty Ltd	13 117 264 712
Ballarat Health Services	
Barcaldine Remote Community Solar Farm Pty Ltd	
Barwon Health	45 877 249 165
BayWa R.E Solar Projects Pty Ltd	27 618 779 623
Baywa R.E. Projects Australia Pty Ltd	51 606 343 757
BayWa r.e. Solar Project Pty Ltd	
Beak Industries Pty Ltd	22 009 535 184
Belectric Australia Pty L	41 157 953 654
Benedict Recycling Pty Ltd	71 123 156 507
BHP Billiton Olympic Dam Limited	99 007 835 761
BHP Billiton Petroleum (Bass Strait) Pty Ltd	29 004 228 004
Biosar Australia Pty Ltd	55 620 817 665
Blayney and Crookwell Windfarm Pty Ltd	88 612 416 029
BlueScope Steel (AIS) Pty Ltd	19 000 019 625
Boral Energy Power Limited	008 289 398
Brown Hill Pty Ltd	96 110 080 325

Bundaberg Sugar Limited	24 077 102 526
Bungala One Operations Pty Ltd as the Trustee for the Bungala One Operations Trust	65 449 871 039
Bungala Two Operations Pty Ltd as trustee for The Bungala Two Operations Trust	77 292 664 630
Callide Energy Pty Ltd	082 468 746
Canadian Solar O&M (Australia) Pty Ltd	31 620 225 809
Canunda Power Pty Ltd	31 103 087 341
Cape Byron Management Pty Ltd	26 165 320 445
Capital East Solar Pty Ltd	77 159 005 973
Capricorn SF No1 Pty Ltd	36 611 727 765
Cathedral Rocks Wind Farm Pty Ltd	87 107 113 708
CECEP Wind Power Australia Holding Pty Ltd	19 611 615 402
Chepstowe Wind Farm Pty Ltd	61 134 638 234
Children's Health Queensland Hospital and Health Service	62 254 746 464
Chinchilla Solar Pty Ltd	49 609 762 343
CKI Utilities Development Limited	090 718 880
CKI Utilities Holdings Limited	091 142 380
CKI/HEI Utilities Distribution Limited	091 143 038
Clare Asset Co Pty Ltd as the Trustee for Clare Asset Trust	72 989 713 062
Coca-Cola Amatil Limited	26 004 139 397
Cochrane Dam Pty Ltd	65 613 015 768
Command Energy Pty Ltd	002 141 068
Como Glasshouse No2 Pty Ltd	47 604 272 942
Condamine Power Station Pty Ltd	76 121 868 273
Contact Peaker Australia Pty Ltd	24 097 586 724
Cullerin Range Wind Farm Pty Ltd	38 126 167 126
CWP Asset Management Pty Ltd	41 143 399 179
CWP Renewables Pty Ltd	57 127 205 645
Darlington Point Solar Farm Pty Ltd	54 615 736 984
DDC Energy Services Pty Ltd	
Deakin University	56 721 584 203
Delta Electricity Australia Pty Ltd	26 074 408 923
Dept of Health QLD(T/A Lady Cilento Children's Hospital)	66 329 169 412
Diamond Energy Generation Pty Ltd	32 114 514 895
Dunblane Solar Pty Ltd	36 619 008 418
Earthconnect Pty Ltd	62 139 647 359
EarthPower Technologies Sydney Pty Ltd	71 085 528 427
Edify Energy Pty Ltd	85 606 684 995
Edison Mission Operation & Maintenance Loy Yang Pty Ltd	055 563 696
EDL CSM (NSW) Pty Ltd	66 064 847 490
EDL CSM (QLD) Pty Ltd	48 098 224 269
EDL Group Operations Pty Ltd	39 055 555 416
EDL LFG (NSW) Pty Ltd	37 070 941 794
EDL LFG (QLD) Pty Ltd	21 071 089 579
EDL LFG (Vic) Pty Ltd	69 061 503 348
EDL Operations (Broadmeadows) Pty Ltd	054 545 069
EDL Operations (Eastern Creek) Pty Ltd	084 776 590

Electranet Pty Ltd	41 094 482 416
Emerald Energy Project Pty Ltd (ACN620 722 769) ATF Emerald Energy Project Trust	46 537 051 902
Enel Energy Australia Pty Ltd	95 632 774 255
Enercon GmbH	108 142 052
Energy Pacific (VIC) Pty Ltd	18 063 543 984
Energy Pacific (Victoria) Pty Ltd	18 063 543 984
Energy Queensland Limited	96 612 535 583
EnergyAustralia Hallett Pty Ltd	42 120 665 643
EnergyAustralia Narrabri Gas Pty Ltd	80 147 609 729
EnergyAustralia NSW Pty Ltd	75 163 935 635
EnergyAustralia Tallawarra Pty Ltd	69 081 074 142
Envirogen (Oakly) Pty Ltd	85 113 489 295
EP Sunspot 1 Pty Limited	43 637 162 175
EP Sunspot 2 Pty Limited	41 637 177 130
Eraring Energy	31 357 688 069
ESCO Pacific Asset Management Pty Ltd	57 623 340 376
Essential Energy	37 428 185 226
Esso Australia Resources Pty Ltd	62 091 829 819
Far Northern Milling Pty Ltd	55 627 502 158
Flagstaff Enterprises Pty Ltd	59 625 801 112
Foresight Solar Australia Pty Ltd	19 611 378 584
FRV Services Australia Pty Limited	60 151 469 662
FRV Services Australia Pty Limited	85 606 684 995
Gastar Power Pty Ltd	45 128 295 063
GESS ProjectCo Pty Ltd	86 621 425 661
Gildemeister LSG Solar Australia Pty Ltd	69 619 064 078
Gippsland Power Pty Ltd	30 077 851 079
Glencore Coal (NSW) Pty Ltd	18 097 523 058
Global Power Generation Australia Pty	74 130 542 031
Goldwind Australia Pty Ltd	32 140 108 390
Goldwind Capital (Australia) Pty Ltd	34 142 403 950
Goonumbla Asset Co Pty Ltd as the Trustee for Goonumbla Asset Trust	80 881 665 313
Gransolar Desarrollo y Contruccion SL	48 614 561 572
GridX Power Pty Ltd	22 100 209 354
Hallet 5 Pty Ltd	74 154 281 160
Hallett Hill Pty Ltd	91 128 246 275
HEI Utilities Development Limited	50 091 142 362
Hydro-Electric Corporation trading as Hydro Tasmania	48 072 377 158
IG Power (Callide) Limited	082 413 885
Infigen Energy Markets Pty Limited	47 128 696 097
Infigen Energy Services Pty Ltd	87 134 668 321
Innogy Renewables Australia Pty Ltd	72 626 156 894
Kennedy Energy Park Pty Ltd	81 605 095 298
Kidston Solar Co Pty Ltd (ACN 614 272 954) ATF The Kidston Solar Property Trust	60 659 240 152
Kimberly-Clark Australia Limited	65 000 032 333
Kogan Creek Power Station Pty Ltd	82 088 229 832

KSF Project Nominees as trustee for the KSF Project Trust	47 321 661 744
Lake Bonney BESS Pty Limited	36 627 620 786
Lake Bonney Wind Power Pty Ltd	48 104 654 837
Lakeland Solar & Storage Pty Limited	86 606 530 198
Latrobe Power Pty Ltd	42 055 983 563
Leonards Hill Wind Operations Pty Ltd	86 141 239 894
Lilyvale Asset Co Pty Ltd (ABN 35 619 625 213) as trustee for the Lilyvale Asset Trust	47 596 077 233
Lincoln Gap Wind Farm Pty Limited	52 133 372 595
LMS Energy Pty Ltd	39 059 428 474
Longreach Asset Company Pty Ltd	82 616 057 848
LYB Australia Limited	87 055 563 785
LYB Operations and Maintenance Pty Ltd	66 055 563 696
LYB Ventures Australia Pty Ltd	57 055 984 499
Macarthur Windfarm Pty Ltd	
Mackay Sugar Limited	12 057 463 671
Malakoff Wind Macarthur Pty	124 383 688
Maroona Wind Farm Pty Ltd	79 158 692 598
Maryrorough Solar Pty Ltd	90 609 762 138
Mecrus Pty Ltd	35 088 126 756
Melbourne Health	73 802 706 972
Melbourne Water Corporation	81 945 386 953
Millmerran Investment Company I Pte Ltd	088 432 599
Millmerran Investment Company II Pte Ltd	088 432 615
Millmerran Investment Company III Pte Ltd	088 432 642
Millmerran Investment Company IV Pte Ltd	088 432 679
Millmerran Investment Company V Pte Ltd	088 432 722
Millmerran Investment Company VI Pte Ltd	088 432 795
Millmerran Operating Company Pty Ltd	083 536 181
Momentum Energy Pty Limited	42 100 569 159
Monash Health	82 142 080 338
Monash University	12 377 614 012
Moorabool Wind Farm Interface Company Pty Ltd	58 615 752 317
Mossman Central Mill Company Limited	31 009 657 103
Mount Emerald Wind Farm Pty Ltd	19 149 050 322
MSF Sugar Pty Ltd	11 009 658 708
Mt Millar Wind Farm Pty Ltd	67 107 673 361
Murra Warra Project Co Pty Ltd (616 990 731) as Trustee for the Murra Warra Project Trust	99 821 016 955
Murraylink HQI Australia Pty Ltd	76 095 760 375
Musselroe Wind Farm Pty Ltd	18 113 161 247
Newcastle City Council	25 242 068 129
Newtricity Developments Biala Pty Ltd	93 605 533 935
Nexif Energy Australia Management Pty Ltd	34 619 325 567
Nexif Energy Australia Pty Ltd	57 611 276 236
NEXTDC Limited	35 143 582 521
North Brown Hill Pty Limited	55 135 520 222
NSW Sugar Milling Co-operative Limited	52 051 052 209

Oakey 1 Asset Company Pty Ltd	47 616 058 069
Oakey Power Holdings Pty Ltd	56 075 260 794
Oaklands Hill Wind Farm Pty	88 126 595 935
One Asset Management AR Pty Ltd as The Trustee for Taillem Bend Solar Asset Trust	25 226 861 648
One Investment Management Pty Limited as The Trustee for Taillem Bend Solar Operating Trust	35 635 157 114
OneSteel Manufacturing Pty Ltd	42 004 651 325
OneSun Capital 10MW Operating Pty Ltd	75 159 029 017
Origin Energy Electricity Pty Ltd	33 071 052 287
Origin Energy Power Limited	93 008 289 398
Origin Energy Uranquinty Power Pty Ltd	
OZ Mineral Prominent Hill Operations Pty Ltd	63 091 546 691
Pacific Hydro Challicum Hills Pty Ltd	88 101 989 744
Pacific Hydro Investments Pty Ltd	18 053 747 407
Pacific Hydro Portland Wind Farm Pty Ltd	75 103 162 474
Palisade Asset Management Pty Ltd	37 606 141 119
Palisade Integrated Management Services Pty Ltd	37 606 141 119
Paper Australia Pty Ltd	63 061 583 533
PARF Company 10 Pty Limited (ACN 618 670 152) as the trustee for the Coppers Gap Project Trust	21 535 038 928
PARF Company 5 Pty Ltd (ABN 47 613 790 453) and PARF Company 6 Pty Ltd	81 613 790 659
PARF Company 6 Pty Ltd	81 613 790 659
PARF Company 8 Pty Ltd as the Trustee of the Silverton Project Trust	33 735 116 532
Perilya Broken Hill Ltd	46 099 761 289
Photon Energy Engineering Australia Pty Ltd	71 159 386 295
Pioneer Sugar Mills Pty Ltd	63 009 889 856
Pirie Solar Farm Pty Ltd	77 624 758 425
Power Rental Op Co Australia LLC (trading as APR Energy)	85 457 881 818
Pyrenees Wind Energy Development Pty Ltd	31 097 047 268
Qenos Pty Ltd	62 054 196 771
Queensland Nickel Pty Ltd	85 009 842 068
Queensland Power (Australia) Pty Ltd	087 293 409
Queensland Power Company Limited	087 293 583
RATCH-Australia Collinsville Solar PV Pty Ltd	88 165 511 937
RATCH-Australia Corporation Limited	31 106 617 332
RATCH-Australia Townsville Pty Limited	65 075 001 991
RCR O'Donnell Griffin Pty Ltd	78 003 905 093
RE Oakey Pty Ltd	38 160 581 626
Regional Wind Farms Pty	11 107 163 182
Renewable Power Ventures Pty Ltd	25 102 696 159
RES Australia Pty Ltd	55 106 637 754
Rise Renewables Pty Ltd	53 621 541 348
Risen Energy (Australia) Pty Ltd	97 168 750 374
Robinvale Project Pty Ltd (ACN 624249234) as trustee for The Robinvale Project Unit Trust	47 410 937 028
Royalla Asset Pty Ltd ATF Royalla Asset Trust	58 169 071 887
RTA Yarwun Pty Ltd	73 137 266 301
Signal Energy Australia Pty Ltd	92 623 114 090

Simplot Australia Pty Ltd	98 070 579 609
SNC-Lavalin Investment Australia Pty Ltd	31 095 833 462
Snowtown South Wind Farm Pty Ltd	50 156 407 313
Solar PowerStations Victoria Pty Ltd	93 600 588 949
South Australian Water Corporation	69 336 525 019
South East Water Limited	89 066 902 547
Spark Infrastructure Holdings No.5 Pty Limited	23 151 150 275
SPI PowerNet Pty Ltd	079 798 173
SPI PowerNet Pty Ltd	78 079 798 173
Spotless Services Pty Ltd	83 072 293 880
St Vincent's Hospital (Melbourne) Limited	22 052 110 755
Stanwell Corporation	37 078 848 674
Starfish Hill Wind Farm Pty Ltd	54 099 761 261
State Owned Generators Leasing Company Pty Ltd	94 638 786 599
Stockyard Hill Wind Farm Pty Ltd	71 118 119 501
Sucrogen (Herbet) Pty Ltd	92 099 000 361
Sun Metals corporation Ltd	97 074 241 982
Sunraysia Solar Project Pty Ltd (ACN 612 072 536) as trustee of Sunraysia Solar Project Trust	86 116 311 664
Sunshine Coast Regional Council	37 876 973 913
Sunshine Renewable Energy Pty Ltd	67 095 991 638
Symex Holdings Limited	29 091 035 353
Taralga Wind Farm Nominees No 1 Pty Ltd	52 159 439 611
Tarong North Pty Ltd	91 102 191 793
Tasmanian Electro Metallurgical Company Pty Ltd	23 004 456 035
Telstra Corporation Limited	33 051 775 556
The Haughton Sugar Company Pty Ltd	009 656 062
The Trustee for Sustainable Energy Infrastructure Trust	50 746 683 694
The University of Melbourne	84 002 705 224
The University of Queensland	63 942 912 684
Tilt Renewables Australia Pty Ltd	15 101 038 331
Timboon West Wind Farm Pty Ltd	608 3487 287
TN Power Pty Ltd	56 099 730 042
Total Eren Australia Pty Ltd	16 617 965 081
Townsville Hospital and Health Service	86 747 187 217
Traralgon Power Pty Ltd	64 056 292 623
TRUenergy Holdings Pty Ltd	42 120 665 643
TrustPower Australia Holdings Pty Ltd	15 101 038 331
Tully Sugar Ltd	92 011 030 256
TW Power Services Pty Ltd	50 112 723 181
UGL ENGINEERING Pty Ltd	96 096 365 972
Vales Point Investments Pty Ltd as trustee for Vales Point Discretionary Trust	608 798 278
Valley Power Pty Ltd	16 083 964 470
Visy Pulp and Paper Pty Ltd	30 086 513 144
Waratah Energy Pty Ltd	64 166 785 619
Waste Recycling and Processing Corporation trading as WSN Environmental Solutions	93 524 709 106

Wattle Point Wind Farm Pty Ltd	34 101 023 447
Whytes Gully Environmental Pty Ltd	070 941 767
Wilmar Sugar (Prosperine) Pty Ltd	49 098 999 994
Wilmar Sugar Australia Limited	47 098 999 985
Wilmar Sugar Pty Ltd	44 081 051 792
Windlab Asset Management Pty Ltd	34 605 094 666
Wirsol Energy Pty Ltd	
Woodlawn Bioreactor Energy Pty Ltd	50 107 490 219
Woolnorth Bluff Point Wind Farm Pty Ltd	31 095 369 396
Woolnorth Studland Bay Wind Farm Pty Ltd	63 111 996 377
Woolworths Group Limited	80 000 014 675
Yawong Wind Farm Pty Ltd	90 614 422 856
Yurika Pty Ltd	100 214 131

Gas

Company Name	ABN/CAN
1st Energy Pty Ltd	71604999706
Actew Distribution Ltd	83 073 025 224
Actew Retail Ltd & AGL Act Retail Investments Pty Ltd	46 221 314 841
Adchem (Australia) Pty Ltd	87 069 180 258
Adelaide Brighton Cement Limited	96 007 870 199
AETV Pty Ltd	29 123 391 613
AGI Tanami Pty Limited	21 622 012 560
AGL Energy Limited	74 115 061 375
AGL Energy Sales & Marketing Limited	18 076 092 067
AGL Gas Storage Pty Ltd	27009203463
AGL Retail Energy Limited	21 074 839 464
AGL Sales (Queensland) Pty Ltd	85 121 177 740
AGL Sales Pty Limited	88 090 538 337
AGL South Australia Pty Limited	49 091 105 092
AGL Upstream Gas (MOS) N.L	56 003 329 084
AGL Upstream Investments Pty Limited	58 115 063 744
AGL Wholesale Gas (SA) Pty Ltd	13 094 384 291
AGL Wholesale Gas Limited	26 072 948 504
Agora Retail Pty Ltd	68 612 806 381
Alcoa Australia	
Alinta Energy Retail Sales Pty Ltd	22 149 658 300
Alinta Sales Pty Ltd	92 089 531 984
Allgas Energy Pty Limited	52 009 656 446
Amanda Energy Pty Ltd	45 163 376 163
Amaysim Energy Pty Ltd	41116567492
Anglo Coal (Dawson Management) Pty Ltd	15 006 746 701
APA Facilities Management Pty Limited	76 140 898 424
APA GasNet Australia (NSW) Pty Limited	14 079 136 413
APA GasNet Australia (Operations) Pty Limited	65 083 009 278
APT AM Holdings Pty Ltd	95 124 754 383
APT Facility Management Pty Ltd	91 124 754 365
APT Parmelia	
APT Petroleum Pipelines Pty Limited	39 009 737 393
Armour Energy (Surat Basin) Pty Limited	61607504905
Armour Energy (Surat Basin) Pty Limited	61 607 504 905
Arrow (Daandine) Pty Ltd	99 114 927 481
Arrow (Southern Generation) Pty Ltd	51 128 813 490
Arrow (Tipton Two) Pty Ltd	36 117 853 755
Arrow (Tipton) Pty Ltd	17 114 927 507
Arrow Braemar 2 Pty Ltd	63 127 500 949
Arrow CSG (Australia) Pty Ltd	54 054 260 650
Arrow Energy Trading Pty Ltd	68139053133
Arrow Energy Trading Pty Ltd	68 139 053 133
Arrow Southern Generation Pty Ltd and Arrow Braemar 2 Pty Ltd	27 245 692 985
ATCO Gas Australia Pty Ltd	45 151 295 439
Aurora Energy Pty Ltd	85 082 464 622
Aus Gas Trading Pty Ltd	71 160 215 627
AusNet Gas Services Pty Ltd	43 086 015 036
Australia Pacific LNG Marketing Pty Limited	51141937920
Australia Pacific LNG Pty Limited	68 001 646 331
Australian Competition & Consumer Commission	94410483623

Australian Competition & Consumer Commission	94 410 483 623
Australian Energy Market Operator Limited	94 072 010 327
Australian Gas Networks (Albury) Limited	84 000 001 249
Australian Gas Networks (NSW) Pty Ltd	94 083 199 839
Australian Gas Networks (VIC) Pty Ltd	73 085 899 001
Australian Gas Networks Limited	19 078 551 685
Australian Pacific LNG CSG Marketing Pty Limited	72 008 750 945
Australian Pipeline Limited as Trustee for Australian Pipeline Trust	21 858 175 226
Australian Pipeline Ltd (99 091 344 704) ATF Australian Pipeline Trust	21858175226
Australian Pipeline Trust (APA Group)	21 858 175 226
Australian Power and Gas Pty Limited	26 118 609 813
B P Australia Pty Ltd	53 004 085 616
Beach Energy (Operations) Limited	66 007 845 338
BGC Partners (Australia) Pty Limited	62092873099
BHP Billiton Cannington Pty Ltd	48 125 530 967
BHP Billiton Cannington Pty Ltd NOT IN USE	48125530967
BHP Billiton Petroleum (Bass Strait) Pty Ltd	29004228004
BHP Billiton Petroleum (Bass Strait) Pty Ltd	29 004 228 004
BHP Billiton Petroleum (Victoria) P/L	12006466486
BHP Billiton Petroleum Pty Ltd	97 006 918 832
BlueScope Steel Limited	16 000 011 058
BOC Limited	95000029729
Boortmalt Asia Pacific Pty Ltd	62004287352
Boyne Smelters Limited	90 010 061 935
Braemar Power Project Pty Ltd	54113386600
Braemar Power Project Pty Ltd	54 113 386 600
Brickworks Building Products Pty Ltd	63 119 059 513
Caltex Refineries (QLD) Pty Ltd	46008425581
Castleton Commodities Merchant Asia Co Pte Ltd	52 153 463 846
Central Petroleum (NT) Pty Ltd	95009718183
Central Petroleum Limited	72 083 254 308
Central Petroleum Mereenie Pty Ltd as trustee for the Central Petroleum Mereenie Unit Trust	92760840674
Central Ranges Pipeline Pty Limited	38 108 218 355
Chinova Resources Osborne Pty Ltd	84061300025
CleanCo Queensland Limited	85628008159
Commonwealth Steel Company Pty Limited	58000007698
ConocoPhillips Australia Operations Pty Ltd	28141253787
Coogee Energy Pty Ltd	69 092 473 795
Cooper Energy (Marketing) Pty Ltd	84631401100
Coopers Brewery Limited	13007871409
Covau Pty Limited	54090117730
CQP Capital Pty Ltd	26097843055
Creative Analytics Pty Ltd	54 137 966 520
CS Energy Ltd	54 078 848 745
CSR Building Products Limited	55008631356
DBP Transmission	78 081 609 289
Department of Energy and Water Supply	91 416 908 913
Department of Industry	74599608295
Department of Infrastructure, Energy and Resources	36 388 980 563
Department of Planning Transport and Infrastructure	92 366 288 135
Department of Resources Energy and Tourism	46 252 861 927
Discover Energy Pty Ltd	20 619 204 750
East Australian Pipeline Pty Limited	33 064 629 009

Eastern Energy Supply Pty Ltd	69638766551
Eastern Energy Supply Pty Ltd	69 638 766 551
EDL CSM (NSW) PTY LTD	66 064 847 490
Electricity Generation and Retail Corporation (trading as Synergy)	
Endeavour Coal	38 099 830 476
Energy Australia Pty Ltd	99 086 014 968
Energy Infrastructure Investments Pty Ltd	95 104 384 852
Energy Infrastructure Management Pty Ltd	75 100 946 389
Energy Locals Pty Ltd	23606408879
Energy One Limited	37076583018
EnergyAustralia Pty Ltd	99086014968
Energymarkets.com.au	5182943
Eni Australia B.V.	18 092 812 023
Enwave Mascot Pty Ltd	22100209354
Epic Energy South Australia Pty Limited	54068599815
Epic Energy South Australia Pty Ltd	54 068 599 815
Ergon Energy Gas Pty Ltd	93 084 411 047
Ergon Energy Queensland Pty Ltd	11121177802
ERM Power Retail Pty Ltd	87126175460
Esso Australia Resources Pty Ltd	62091829819
Esso Australia Resources Pty Ltd	62 091 829 819
EWN Publishing Pty Ltd	58 050 098 952
Flinders Operating Services Pty Ltd	36 094 130 837
Gas Pipelines Victoria Pty Ltd	83 079 003 099
Gas Trading Australia	
Geraldton Brick Pty Ltd	42 158 998 639
GLNG Operations Pty Ltd	66132321192
GLNG Operations Pty Ltd	66132321192
Global-Roam Pty Ltd	31 091 533 587
GloBird Energy Pty Ltd	68600285827
GOEnergy Pty Ltd	14097708104
Hydro-Electric Corporation	48 072 377 158
ICAP Australia Pty Limited	55002216944
Incitec Pivot Limited	42004080264
Incitec Pivot Limited	42 004 080 264
Infrabuild NSW Pty Ltd	59 003 312 892
International Power (Energy) Pty Ltd	53062798510
International Power (Energy) Pty Ltd	53 062 798 510
Iona Asset Pty Ltd	
IPower 2 Pty Limited & IPower Pty Limited	67269241237
IPower Pty Limited & IPower 2 Pty Limited	67 269 241 237
Jemena Colongra Pty Ltd	13 127 533 519
Jemena Darling Downs Pipeline (1) Pty Ltd	52072109865
Jemena Darling Downs Pipeline (2) Pty Ltd	93125873869
Jemena Darling Downs Pipeline (3) Pty Ltd	83127059152
Jemena Darling Downs Pipeline (3) Pty Ltd	83 127 059 152
Jemena Eastern Gas Pipeline (1) Pty Ltd	15068570847
Jemena Eastern Gas Pipeline (1) Pty Ltd	15 068 570 847
Jemena Eastern Gas Pipeline (2) Pty Ltd	77 006 919 115
Jemena Eastern Gas Pipeline (2) Pty Ltd	77006919115
Jemena Gas Networks (NSW) Ltd	87 003 004 322
Jemena Northern Gas Pipeline Pty Ltd	12607928790
Jemena Northern Gas Pipeline Pty Ltd	12 607 928 790
Jemena Queensland Gas Pipeline (1) Pty Ltd	97083050284

Jemena Queensland Gas Pipeline (1) Pty Ltd	97 083 050 284
Jemena Queensland Gas Pipeline (2) P/L	70 083 050 104
Jemena Roma North Pipeline Pty Ltd	17 621 731 995
Jemena VicHub Pipeline Pty Ltd	61085550689
Jemena VicHub Pipeline Pty Ltd	61 085 550 689
KGLNG Liquefaction Pty Ltd	39146143311
Lattice Energy Limited	66 007 845 338
Lochard Energy (Iona Operations) Pty Ltd	67608441729
Lochard Energy (Iona Operations) Pty Ltd	67 608 441 729
Lochard Energy (Iona Operations) Pty Ltd as trustee for Lochard Energy (Iona Operations) Trust	25 151 811 449
Logica Australia Pty Ltd	39 001 260 699
Lumo Energy (NSW) Pty Ltd	92 121 155 011
Lumo Energy (SA) Pty Ltd	61 114 356 697
Lumo Energy Australia Pty Ltd	69 100 528 327
M2 Energy Pty Ltd (T/As Commander Power & Gas)	15123155840
M2Energy Pty Ltd (T/As Dodo Power & Gas)	15 123 155 840
Macquarie Bank Ltd	46008583542
Macquarie Mereenie Pty Limited	36 616 486 974
Major Energy Users Inc.	71 278 859 567
Master Butchers Co-Operative Limited	58 874 245 597
Michell Wool Pty Limited	11 165 515 604
Millmerran Energy Trader Pty Ltd	23084923973
Mitsui E&P Australia Pty Ltd	45108437529
MMG Century Limited	59 006 670 300
Mobil Oil Australia Pty Ltd	88 004 052 984
Momentum Energy Pty Limited	42100569159
Mount Isa Mines Ltd	87 009 661 447
Multinet Gas (DB No 1) Pty Ltd & Multinet Gas (DB No 2) Pty Ltd	53 634 214 009
NewGen Power Kwinana P/L	
Norske Skog Paper Mills (Albury) Pty. Limited	70 070 866 607
Norske Skog Paper Mills (Australia) Ltd	84 009 477 132
Northern Oil Refineries Pty Ltd	47151738966
Northern Territory Government, Department of Resources, Minerals & Energy	84 085 734 992
NovaPower Pty Ltd	44 119 925 334
Nyrstar Port Pirie Pty Ltd	31008046428
Oceania Glass Pty Ltd	99 630 152 206
O-I International Pty Ltd	97006005929
OneSteel Coil Coaters Pty Ltd	81 123 138 732
OneSteel Manufacturing Pty Limited	42004651325
OneSteel Manufacturing Pty Limited	42 004 651 325
OneSteel Trading Pty Limited	50 007 519 646
Orica Australia Pty Ltd	99004117828
Orica Australia Pty Ltd	99 004 117 828
Orica IC Assets Pty Ltd	41 010 767 263
Orica International Pte Ltd	18136386069
Origin Energy (VIC) Pty Limited	11 086 013 283
Origin Energy Electricity Limited	33071052287
Origin Energy LPG Limited	77 000 508 369
Origin Energy Petroleum Pty Limited	75 010 728 962
Origin Energy Retail Limited	22 078 868 425
Origin Energy Retail Ltd	22078868425
Origin Energy Uranquinty Power Pty Ltd	26 120 384 938
Orora Packaging Australia Pty Ltd	32165443667

OVO Energy Pty Ltd	99623475089
Paper Australia Pty Ltd	63 061 583 533
PAPL (Downstream) Pty Limited	43147649205
Pelican Point Power Limited	11 086 411 814
Pentair Water Solutions Pty Limited	75 087 415 745
Perth Energy Pty Ltd	39 087 386 445
PetroChina International (Australia) PL	67618641697
PME Consulting Pty Ltd	85 086 231 996
Power and Water Corporation	15 947 352 360
Powershop Australia Pty Ltd	41154914075
Qenos Pty Ltd	62054196771
Qenos Pty Ltd	62 054 196 771
QER Pty Ltd	48 072 908 966
QGC Pty Limited	11 089 642 553
Queensland Alumina Limited	98 009 725 044
Queensland Nitrates Pty Ltd	63079889268
Red Energy Pty Limited	60 107 479 372
RTA Yawrun Pty Ltd	73 137 266 301
Santos CSG Pty Ltd	72121188654
Santos Direct Pty Ltd	62108846288
Santos Direct Pty Ltd	62108846288
Santos Direct Pty Ltd	62 108 846 288
Santos GLNG Pty Ltd	12131271648
Santos Limited	80007550923
Santos Limited	80 007 550 923
Santos Limited	80 007 550 923
Santos QNT Pty Ltd	33083077196
Santos QNT Pty Ltd	33 083 077 196
Santos Toga Pty Ltd	46077536871
Senex Assets Pty Ltd	48160649338
Shell Energy Australia Pty Ltd	18085757446
Shoalhaven Starches Pty Ltd	94000045045
Simplot Australia Pty Limited	98070579609
Sinclair Knight Merz Pty Limited	37 001 024 095
Snowy Hydro Limited	17090574431
South Australian Water Corporation	69336525019
South East Australia Gas Pty Ltd	73096437900
South East Australia Gas Pty Ltd	73 096 437 900
Southern Natural Gas Development Proprietary Limited	87 004 724 038
Stanwell Corporation Limited	37078848674
Stanwell Corporation Limited	37 078 848 674
Strategic Gas Market Trading Pty Ltd	60613884978
Strategic Gas Market Trading Pty Ltd	60 613 884 978
Sumo Gas Pty Ltd	67 606 951 713
Sunset Power International Pty Ltd	75 162 696 335
Synergen Power Pty Limited	66 092 560 819
Tarac Technologies Pty Ltd	28007513813
Tas Gas Retail Pty Ltd	90 110 370 726
Tasmanian Gas Pipeline Pty Ltd	36083052019
Tasmanian Gas Pipeline Pty Ltd	36 083 052 019
Territory & Municipal Services Directorate	37 307 569 373
The Australian Steel Company (Operations) Pty Ltd	89 069 426 955
Total GLNG Australia	99999999999
VIPAC Engineers and Scientists Limited	33 005 453 627

Visy Paper Pty Ltd	49 984 541 896
Visy Pulp and Paper Pty Ltd	30 086 513 144
Viva Energy Refining Pty Ltd	46004303842
Vivienne Court Trading Pty Ltd	86153821571
Walloons Coal Seam Gas Company Pty Limited	53130344366
Wesfarmers Kleenheat Gas Pty Ltd	40 008 679 543
Western Downs Regional Council	91232587651
Weston Aluminium Pty Limited	91075245108
Weston Energy Pty Ltd	47142392738
Westpac Banking Corporation	33 007 457 141
Westside Corporation Limited	74117145516
Westside CSG A Pty Ltd	80138989358
Westside CSG D Pty Ltd	82140474362
Woodside Energy Ltd	63 005 482 986

Participants in the GBB

Company Name	ABN
Actew Distribution Ltd	83 073 025 224
Adelaide Brighton Cement Limited	96 007 870 199
AETV Power	29 123 391 613
AETV Power No 2	29 123 391 613
AGI Tanami Pty Limited	21 622 012 560
AGL Energy Limited	74 115 061 375
AGL Gas Storage Pty Ltd	27009203463
AGL Sales (Queensland) Pty Limited	85 121 177 740
AGL Sales Pty Limited	88 090 538 337
AGL Upstream Gas (MOS) N.L	56 003 329 084
AGL Upstream Investments Pty Limited	58 115 063 744
AGL Wholesale Gas (SA) Pty Ltd	13 094 384 291
AGL Wholesale Gas Limited	26 072 948 504
Agora Retail Pty Ltd	68 612 806 381
Alinta Energy Retail Sales Pty Ltd	22 149 658 300
Allgas Energy Pty Limited	52 009 656 446
APA Facilities Management Pty Ltd (OP)	76 140 898 424
APA Facilities Management Pty Ltd (TL)	76 140 898 424
APA GasNet Australia (Operations) P/L	65 083 009 278
APA Group	21 858 175 226
APT AM Holdings Pty Ltd	95 124 754 383
Armour Energy (Surat Basin) Pty Limited	61 607 504 905
Arrow (Daandine) Pty Ltd	99 114 927 481
Arrow (Southern Generation) Pty Ltd	51 128 813 490
Arrow (Tipton Two) Pty Ltd	36 117 853 755
Arrow (Tipton) Pty Ltd	17 114 927 507
Arrow Braemar 2 Pty Ltd	63 127 500 949
Arrow CSG (Australia) Pty Ltd	54 054 260 650
Australia Pacific LNG Pty Limited	68 001 646 331
Australian Competition & Consumer Commission	94 410 483 623
Australian Energy Market Operator Ltd	94 072 010 327
Australian Pacific LNG CSG Marketing P/L	72 008 750 945
B P Australia Pty Ltd	53 004 085 616
Beach Energy (Operations) Limited	66 007 845 338
BHP Billiton Cannington Pty Ltd	48 125 530 967
BHP Billiton Petroleum (Bass Strait) 2	29 004 228 004
BHP Billiton Petroleum (Bass Strait) P/L	29 004 228 004
BHP Billiton Petroleum (Victoria) P/L	12006466486
BHP Billiton Petroleum Pty Ltd	97 006 918 832
BOC Limited	95000029729
Boyne Smelters Limited	90 010 061 935
Braemar Power Project Pty Ltd	54 113 386 600
Caltex Refineries (QLD) Pty Ltd	46008425581

Castleton Commodities Merchant Asia Co	52 153 463 846
Central Petroleum (NT) Pty Ltd	95009718183
Central Petroleum Limited	72 083 254 308
Central Petroleum Mereenie Unit Trust	92760840674
Chinova Resources Osborne Pty Ltd	84061300025
CleanCo Queensland Ltd	85628008159
Click Energy Pty Ltd	41116567492
CNOOC QCLNG Tolling Pty Ltd	51 142 591 142
Covau Pty Limited	54090117730
Creative Analytics Pty Ltd	54 137 966 520
CSR Building Products Limited	55008631356
Delta Electricity	75 162 696 335
Denison Gas Ltd	86 625 883 561
Department of Energy and Water Supply	91 416 908 913
Dept Infrastructure, Energy & Resources	36 388 980 563
Dept Planning Transport & Infrastructure	92 366 288 135
Dept Resources, Energy & Tourism	46 252 861 927
EIM	75 100 946 389
Energy Infrastructure Investments PtyLtd	95 104 384 852
EnergyAustralia Pty Ltd	99 086 014 968
EnergyAustralia Pty Ltd No. 2	99 086 014 968
Eni Australia B.V.	18 092 812 023
Epic Energy South Australia Pty Ltd	54 068 599 815
ERM Business Energy	87126175460
Esso Australia Resources Pty Ltd	62 091 829 819
Esso Australia Resources Pty Ltd 2	62 091 829 819
GLNG Operations Pty Ltd	66132321192
Global-Roam Pty Ltd	31 091 533 587
GloBird Energy Pty Ltd	68600285827
Hydro Tasmania	48 072 377 158
Incitec Pivot Limited	42 004 080 264
Infrabuild NSW Pty Ltd	59 003 312 892
International Power (Energy) Pty Ltd	53 062 798 510
Iona Asset Pty Ltd	
Jemena Colongra Pty Ltd	13 127 533 519
Jemena Darling Downs Pipeline (1) P/L	52072109865
Jemena Darling Downs Pipeline (2) P/L	93125873869
Jemena Darling Downs Pipeline (3) P/L	83127059152
Jemena Eastern Gas Pipeline (1) Pty Ltd	15 068 570 847
Jemena Gas Networks (NSW) Ltd	87 003 004 322
Jemena Northern Gas Pipeline Pty Ltd	12 607 928 790
Jemena Queensland Gas Pipeline (1) P/L	97 083 050 284
Jemena Roma North Pipeline Pty Ltd	17 621 731 995
Jemena VicHub Pipeline Pty Ltd	61 085 550 689
Lochard Energy	25 151 811 449
Lochard Energy (Iona Operations) Pty Ltd	67 608 441 729

Lumo Energy Australia Pty Ltd	69 100 528 327
M2 Energy Pty Ltd	15 123 155 840
Macquarie Bank Ltd	46008583542
Macquarie Mereneie Pty Limited	36 616 486 974
Major Energy Users Inc.	71 278 859 567
MMG Century Limited	59 006 670 300
Mobil Oil Australia Pty Ltd	88 004 052 984
Momentum Energy Pty Limited	42100569159
Mount Isa Mines Ltd	87 009 661 447
Newgen Braemar 2 Partnership	27 245 692 985
Northern Oil Refineries Pty Ltd	47151738966
NSW Trade & Investment	
NT Dept Resources, Minerals & Energy	84 085 734 992
Nyrstar Port Pirie Pty Ltd	31008046428
O-I International Pty Ltd	97006005929
OneSteel Manufacturing Pty Limited	42 004 651 325
Orica Australia Pty Ltd	99 004 117 828
Orica International Pte Ltd	18136386069
Origin Energy (VIC) Pty Limited	11 086 013 283
Origin Energy Electricity Limited	33071052287
Origin Energy LPG Limited	77 000 508 369
Origin Energy LPG Limited No. 2	77 000 508 369
Origin Energy Retail Ltd	22 078 868 425
Origin Energy Uranquinty Power Pty Ltd	26 120 384 938
Orora Packaging Australia Pty Ltd	32165443667
Paper Australia	63 061 583 533
Pelican Point Power Limited	11 086 411 814
PME Consulting Pty Ltd	85 086 231 996
Power and Water Corporation	15 947 352 360
Powershop	41154914075
Qenos Pty Ltd	62 054 196 771
QER Pty Ltd	48 072 908 966
QGC Pty Limited	11 089 642 553
QGC Train 1 Tolling Pty Ltd	87142293650
Queensland Alumina Limited	98 009 725 044
Queensland Magnesia Pty Ltd	
Queensland Nitrates Pty Ltd	63079889268
Red Energy Pty Limited	60 107 479 372
RTA Yarwun Pty Ltd	73 137 266 301
Santos CSG Pty Ltd	72121188654
Santos Direct Pty Ltd	62 108 846 288
Santos Limited	80 007 550 923
Santos Limited (Shipper)	80 007 550 923
Santos QNT Pty Ltd	33 083 077 196
Santos Toga Pty Ltd	46077536871
SEA Gas	73 096 437 900

Simplot Australia Pty Limited	98070579609
Simply Energy	67 269 241 237
Simply Energy No. 2	67269241237
Sinclair Knight Merz Pty Limited	37 001 024 095
South Australian Water Corporation	69336525019
South West Qld Producers (Santos)	
Stanwell Corporation Limited	37 078 848 674
Strategic Gas Market Trading Pty Ltd	60 613 884 978
Sumo Gas Pty Ltd	67 606 951 713
Synergen Power Pty Limited	66 092 560 819
Tarac Technologies	28007513813
Tas Gas Retail Pty Ltd	90 110 370 726
Tasmanian Gas Pipeline Pty Ltd	36 083 052 019
Territory & Municipal Services	37 307 569 373
The Australian Steel Company(Operations)	89 069 426 955
Victorian Transmission System	
Visy Paper	49 984 541 896
Viva Energy Refining Pty Ltd	46004303842
Viva Energy Refining Pty Ltd 2	46004303842
W & G Energy Markets	5182943
Walloons Coal Seam Gas Company Pty Ltd	53130344366
Western Downs Regional Council	91232587651
Weston Energy Pty Ltd	47142392738
Westpac Banking Corporation	33 007 457 141
Westside Corporation Limited	74117145516

Participants registered in the WEM

A Star Electricity
Advanced Energy Resources
AER Retail PTY LTD
Alcoa of Australia Limited
Alinta Sales Pty Ltd
Amanda Australia Pty Ltd
Amanda Energy Pty Lt
Australian Energy Market Operator
Australian Energy Market Operator
BAI Communications Pty Ltd
BEI WWF Pty Ltd ATF WWF Trust
Blair Fox Pty Ltd AFT The Blair Fox Trust
Blue Star Energy Pty Ltd
Bluewaters Power 1 Pty Ltd
Bluewaters Power 2 Pty Ltd
Byford Solar Farm 1 Pty Ltd
Byford Solar Farm 2 Pty Ltd
Byford Solar Farm 3 Pty Ltd
Change Energy Pty Ltd
CleanTech Energy Pty Ltd
Clear Energy Pty Ltd
Cockburn Cement LTD
Collgar Wind Farm
Collie Energy Hub Pty Ltd
Community Electricit
Coolimba Power Pty Ltd
Denmark Community Windfarm Ltd
East Rockingham RRF Project Co Pty Ltd
EDWF Manager Pty Ltd
EMRC
Eneabba Energy Pty Ltd
Eneabba Gas Limited
EnerNOC Australia Pty Ltd
ERM Power Retail Pty Ltd
Evolution Mining Pty Limited
Exergy Power Pty. Ltd.
Genthrust Pty Ltd
Goldfields Power Pty Ltd
Greenough River
HBJ Minerals Pty Ltd
Independent Market Operator
Karara Energy Pty Ltd
Kwinana WTE Project Co Pty Ltd
Landfill Gas and Power Pty Ltd

Lower Ord Ltd
Merredin Energy
Merredin Solar Farm Nominee Pty Ltd
Metro Power Company Pty Ltd
Moonies Hill Energy
Mt.Barker Power Company Pty Ltd
Mumbida Wind Farm Pty Ltd
NewGen Neerabup Partnership
NewGen Neerabup Pty Ltd
NewGen Power Kwinana Pty Ltd
Newmont Power Pty Ltd
Northam Solar Project Partnership
Northern Star Kanowna Limited
Perth Energy Pty Ltd
Phoenix Energy
Primary Growth Pty Ltd
Simcoa Operations
SkyFarming Pty Ltd
Southern Cross Energy
Southern Energy WA Pty Ltd
SpringSolar Pty Ltd
SRV AGWF Pty Ltd as trustee for AGWF Trust
SRV GRSF Pty Ltd as Trustee for GRSF Trust
Sun Brilliance Cunderdin Solar Farm Pty Ltd
Synergy
Synergy
Teewana Farm Pty Ltd ATF The Teewana Syndicate
Tesla Corporation Management Pty Ltd
Tesla Corporation Pty Ltd
Tesla Geraldton Pty Ltd
Tesla Holdings
Tesla Kemerton Pty Ltd
Tesla Northam Pty Ltd
Tronox Management Pty Ltd
UON Pty Ltd
Waddi Wind Farm Pty Ltd
Walkaway Wind Power Pty Ltd
Waste Gas Resources Pty Ltd
Water Corporation
Wesfarmers Kleenheat Gas Pty Ltd
Western Australia Biomass Pty Ltd
Western Energy Pty Ltd
Western Power
Western Power

Participants in the GBB (WA)

AGL Sales Pty Ltd
Alcoa of Australia Ltd
Alinta Energy Finance Pty Ltd
AngloGold Ashanti Australia Ltd
APA Power Holdings Pty Limited
APT Facility Management Pty Limited
ATCO Power Australia (Karratha) Pty Ltd
Australian Pipeline Trust (t/a APA)
AWE Perth Pty Ltd
BHP Billiton Iron Ore Pty Ltd
BHP Billiton Nickel West Pty Ltd
BHP Billiton Petroleum Pty Ltd
Billabong Gold Pty Ltd
Birla Nifty Pty Ltd
BP Refinery (Kwinana) Pty Ltd
Chevron Australia Pty Ltd (as operator of Gorgon)
Chevron Australia Pty Ltd (as operator of the Wheatstone Plant)
Citic Pacific Mining Management Pty Ltd
CSBP Ltd
DBNGP (WA) Transmission Pty Ltd
DDG Operations Pty Ltd
DDG Operations Pty Ltd
DDG Tubridgi Pty Ltd
EDL LNG (WA) Pty Ltd
Electricity Generation and Retail Corporation (t/a Synergy)
Esperance Power Station Pty Ltd
Exmouth Power Station Pty Ltd
FMG Pilbara Pty Ltd
Gas Trading Australia Pty Ltd
Goldfields Power Pty Ltd
GSM Mining Company Pty Ltd
Independence Jaguar Limited
IPM (Kwinana) Pty Ltd for and on behalf of the Perth Power Partnership (ABN 62 611 338 990)
Lattice Energy Resources (Perth Basin) Pty Limited
Matilda Operations Pty Ltd
Mt Morgans WA Mining Pty Ltd
Murrin Murrin Operations Pty Ltd
Neometals Energy Pty Ltd
Newcrest Mining Limited
NewGen Neerabup Pty Ltd
NewGen Power Kwinana Pty Ltd
Newmont Power Pty Ltd
North West Shelf Lifting Coordinator Pty Ltd

Northern Star Resources Ltd
Origin Energy Retail Limited
Perth Energy
Pilbara Iron Company (Services) Pty Ltd
Pilbara Iron Pty Ltd
Quadrant Energy Australia Limited
Regional Power (t/a Horizon Power)
Rosslyn Hill Mining Pty Ltd
Saracen Metals Pty Ltd
Shell Energy Australia Pty Ltd
South32 Worsley Alumina Pty Ltd
St. Barbara Ltd
TEC Hedland Pty Ltd
TEC Pipe Pty Ltd
The Pilbara Infrastructure Pty Ltd
Tianqi Lithium Kwinana Pty
TransAlta Energy (Australia) Pty Ltd
Triangle Energy Pty Ltd
Wesfarmers Energy (Gas Sales) Ltd
Wesfarmers Gas Ltd
Wesfarmers Kleenheat Gas Pty Ltd
Woodside Burrup Pty Ltd
Yara Pilbara Fertilisers Pty Ltd