



25 May 2021

Attention: Gavin Jones
Director, Competition Exemptions
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2061

Submitted via email to exemptions@accc.gov.au

Dear Mr Jones,

Origin is supportive of the draft determination to grant authorisation with the proposed condition requiring continual disclosure by LNG producers while they coordinate maintenance. The condition is a critical remedy for the information asymmetry that would arise where LNG producers are privy to knowledge pertaining to market supply/demand dynamics that is not publicly known.

While the incoming Gas Transparency Measures (GTM) will allow for the reporting of LNG maintenance 12 months out, it will not do so for activity beyond this period, essentially violating a key feature of the current condition that LNG producers must disclose information once it has been shared with other Applicants.

As far as Origin is aware, implementation of the GTM did not explicitly consider the appropriateness of a 12-month reporting timeframe for LNG maintenance activity, and so the new measures cannot automatically be deemed suitable. It is our understanding the GTM utilised the definition of medium-term capacity outlooks set out in the NGR where there was a previous 12-month reporting requirement for producers, storage facilities, and pipelines. While this approach may be generally appropriate; there is a significant point of difference in the case of LNG maintenance given the sharing of market-sensitive information amongst the producers (which the rest of the market is not privy to) and the potential impact of the activity given the size of the projects.

If you have any questions, please contact Tom Strokon at [REDACTED] or [REDACTED].

Kind Regards,



Steve Reid
Group Manager, Regulatory Policy
Origin Energy