



10 March 2015

Australian Energy Market Operator
GPO Box 2008
Melbourne VIC 3000

Submitted electronically

Dear Hugh,

Re: Redundant Force Majeure Provisions in DWGM

Lumo Energy welcomes the opportunity to comment on the Impact & Implementation Report (IIR) which outlines the required changes to AEMO's Procedures as a result of the National Gas Amendment (Removal of Force Majeure Provisions on the DWGM) Rule Determination published by the Australian Energy Market Commission (AEMC) on 11 December 2014.

We are 100% owned by Snowy Hydro Limited. We sell gas and electricity in Victoria and New South Wales and electricity in South Australia and Queensland. We are currently one of the largest second tier retailers.

The changes to AEMO's Procedures follow the National Gas Amendment (Removal of Force Majeure Provisions on the DWGM) Rule Determination made by the AEMC. The changes will specifically impact the Wholesale Market Administered Pricing Procedures (Victoria) and the Wholesale Market Compensation Procedures (Victoria).

We have reviewed the proposed changes to AEMO's Procedures. Whilst we did not support the Rule change proposed by AEMO on this matter, we are comfortable that the changes outlined in the IIR appear to be consistent with the AEMC's decision on this rule change. The changes are made up of:

- updates to the reflect removal of the force majeure provisions from the National Gas Rules (NGR);
- changes that require AEMO to consult with the industry on proposed changes to the Administered Price Cap (APC) or Cumulative Price Threshold (CPT).

We would like to thank the AEMO for the opportunity to provide comments on this Procedure change. Should you have any further enquiries regarding this submission, please call Con Noutso Wholesale Regulatory Manager on 03 9976 5701.

Yours sincerely

A handwritten signature in black ink, appearing to read "Con Noutso", written over a white background.

Con Noutso
Wholesale Regulatory Manager
Lumo Energy Australia Pty Ltd