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Mr Jack Fitcher  
Chief Financial Officer (Acting)  
Australian Energy Market Operator Ltd  
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By E-mail: [Jack.Fitcher@aemo.com.au](mailto:Jack.Fitcher@aemo.com.au)

### **Initial consultation paper - AEMO Gas Market Fee Methodology**

Dear Jack

Multinet appreciates the opportunity to respond to AEMO on the consultation paper, AEMO Gas Market Fee Methodology.

Multinet is supportive of the current structure of participant fees paid by Market Participants being maintained for a 5 year period as this offers certainty and predictability to the market.

The consultation paper offers several options for cost recovery, including an arrangement where costs are recovered over a 5 year rolling period or costs are recovered in order to achieve an annual break even approach.

Multinet note that utility bills, particularly electricity, are rising steeply and the affordability of energy is receiving more attention from consumers. In this light, Multinet suggests that efforts to smooth the fees to participants, and ultimately price increases to consumers, is more appropriate. If the DWGM and the STTM costs were to be smeared into a single fee, this should not create an adverse material impact for Victorian consumers.

Multinet support the allocation of costs relating to the Gas Statement of Opportunities and Energy Consumers Australia Fees continuing to be on a per supply point basis. This provides a more equitable allocation of these costs, which are market services ultimately for the benefit of consumers, across a number of jurisdictions compared with energy allocation.

The NGR changes which resulted in the formation of AEMO also resulted in non DTS areas in Victoria being included in the Retail Market Procedures. AEMO is also seeking to treat all metering consistently within the Retail Market Procedures. On the basis that the underlying framework is no longer relevant for services agreements and retail markets and metering are treated consistently with the DTS, distribution meter fees and CTM metering for non DTS should be treated consistently with the DWGM equivalent fees.

Should you have any question relating to this response, please feel free to phone (03) 8846 9856.

Yours sincerely

Verity Watson  
Manager Regulatory Strategy