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**ExxonMobil**  
*Gas & Power  
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October 29, 2004

Manager - Energy Market Reform Team  
National Energy Market Branch  
Department of Industry, Tourism and Resources  
GPO Box 9839  
CANBERRA ACT 2601

Dear Sir or Madam,

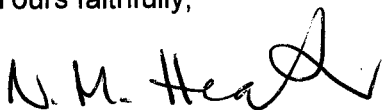
I refer to the Ministerial Council on Energy Standing Committee of Officials' (MCE) issues paper for the National Gas Emergency Response Protocol dated October 2004. Please find attached the submission of ExxonMobil to the consultation paper addressing the key issues.

Beginning in the mid-1990s the removal of barriers to gas market participation has resulted in significant new investment in the gas industry both in pipeline infrastructure and in upstream developments which have increased the number of natural gas producers. In the shallow and illiquid Australian energy market, this investment, which has been driven by long term contracts, has brought about far greater options for securing supply during shortages and emergencies. To encourage further market development it is critical that market participants are allowed to resolve supply shortages and that Governments only exercise emergency powers of direction as a last resort for system security and public safety. Clear principles limiting Government intervention to genuine emergency situations will ensure confidence in contractual arrangements and encourage the market to develop contractual and investment solutions to mitigate future supply shortages.

ExxonMobil believes there is value in the development of a gas emergency protocol that would describe key industry personnel necessary for emergency management, industry communication and information flows during an emergency and timing and principles for Government action. Clearly such a protocol would best be developed and agreed with industry.

ExxonMobil would welcome the opportunity to work with other industry participants to develop an effective, efficient industry agreed emergency protocol. We look forward to providing further comment to the MCE and being an active participant in debate as specific recommendations are developed.

Yours faithfully,



**N M Heath**  
Gas & Power Marketing Director

An ExxonMobil Subsidiary

# National Gas Emergency Response Protocol

## Submission by ExxonMobil

29 October, 2004

### Introduction

ExxonMobil is a producer of gas from the Gippsland basin in Victoria through its subsidiary Esso Australia Resources Pty Ltd. This gas is supplied to customers in Victoria, New South Wales, the ACT, Tasmania and South Australia. Critical to the supply of gas to these markets is the efficient development and operation of the transmission and distribution pipelines throughout the eastern States of Australia.

In addition, ExxonMobil is seeking to become a major gas producer in Papua New Guinea (PNG) and in the Carnarvon Basin of Western Australia. Our PNG marketing group is actively marketing gas into the north and east of Australia. If successful, the project will require very significant investment for the development of both gas production facilities and transmission pipelines. Our marketing activities for Carnarvon Basin gas targets both export LNG sales and domestic gas sales in Western Australia.

ExxonMobil as a major participant in the Australian gas industry has a significant interest in the recommendations that may be made by the Ministerial Council on Energy and ultimately any changes that are made by Governments.

Before identifying and discussing the issues raised in the National Gas Emergency Response Protocol Issues Paper, it is important to first to take a higher level view of some key principles that should govern the development of an effective protocol in the Australian market context.

- Investment in efficient exploration for and development of Australia's gas resources including efficient investment in storage and the transmission system to get these resources to market, must be maximized. Key to the mitigation of supply emergencies is continued investment throughout the supply chain. While depth and diversification of gas supply options is vital, so is a well developed gas transmission grid that provides a means of rapidly delivering this gas on a short term basis in the event of a shortfall. In the shallow and illiquid Australian market, long term contracts are vital for the underwriting of such investments.
- State and Federal Governments do not have a natural role in resolving gas supply shortfalls. They are not major consumers of gas and they do not produce gas. Jurisdictions are not active participants like the producers, transporters, retailers and consumers. Consequently, they should limit their role to those areas where they can add value by representing broad collective cross-jurisdictional social goals.

- Security of energy supply needs to be carefully considered by retailers as new developments occur and long term supply agreements are put in place for the benefit of end consumers. Industry participants should be encouraged to manage gas supply shortfalls through contractual and market based mechanisms. The basis for gas supply during a shortfall event would probably involve a portfolio of freely negotiated long term firm and "as available" gas supply contracts. End consumers, or Governments acting on behalf of consumers, must contract with suppliers for their own specific supply security requirements. Governments should not override and arbitrarily re-allocate these contracted rights during times of supply shortfall.
- Signaling the willingness of Government to intervene during a supply shortfall, runs the significant risk of suppressing market based solutions and associated investment. Governments should provide a consistent light-handed regulatory environment in order to provide certainty for investment and to allow the market to support commercial solutions which meet participant needs. Governments must refrain from parochial State protective emergency directions which override freely negotiated contracts. In this way, gas trade across state boundaries will at all times, including during shortfalls, be free from State or regional restraints. Only when there is an issue of gas supply shortfall which is so critical as to result in serious system loss of pressure and attendant safety problems should governments declare an emergency and intervene. Intervention would address security of vital public health services, allow the allocation of limited supplies and ensure orderly large scale curtailment and resumption of loads.
- Retailers play an important role having a relationship with all parts of the supply chain. With most gas flowing through their control, they can play a vital role in pre-planning and in the management of an emergency. Gas retailers, not producers, are responsible for providing security of supply to their customers. Gas retailers have a vital role to contract appropriate gas supplies to meet the needs of their customers and this should extend to the management of gas system supply shortages.
- The flow of information and coordination between affected and other key market participants is important in mitigating the impact and resolving gas emergencies. The industry is in the best position to rapidly respond to and manage supply emergencies. It is therefore important that industry be allowed by Government to take a role in developing, managing and implementing a National Emergency Response Protocol.

## **Issues Raised in the National Gas Emergency Response Protocol Issues Paper**

### **HOW EFFECTIVE IS THE MARKET IN MANAGING A GAS SHORTFALL?**

#### *Comment is sought on:*

*How effective are current market arrangements in meeting gas shortfalls?*

*How can market activities be communicated to responsible agencies?*

*Whether there are any other barriers to market effectiveness?*

*Whether market support mechanisms could be introduced that would allow participants to respond to emergencies in a manner that precludes Government involvement?*

*What efficient options are there for recovering additional costs?*

To enable the market to develop facilities to better manage gas shortages it is vital that gas prices are allowed to be determined by the market during shortages. This will enable commercial signals for both demand and supply side pre-investment and that there are both supply and demand side actions taken on the day of the shortage. Pre-investment is required across the gas industry in; (i) pipelines, to ensure maximum practical gas flow during a shortage; (ii) additional production and storage facilities bringing additional gas capacity to market during a shortfall; and (iii) most importantly, industrial end customers' sites to estimate back-up fuel supplies and/or gas demand reduction. To allow price signals to drive these market responses, it is critical that Governments refrain from intervention during a gas shortfall. Early intervention by Governments during supply shortages removes the incentive for market participants to develop their own commercial solutions. Market based solutions will only occur if security of energy supply is allowed to gain sufficient value prior to and during shortfalls to encourage this vital pre-investment.

The Issues Paper suggests that the absence of a transparent liquid short term wholesale market and uncertainty regarding recovery of additional supply costs are barriers to participants trying to arrange additional gas supplies to meet shortfalls. We disagree. Firstly the Australian gas market is illiquid and lacks depth in offtake customers. This is a natural consequence of the size of the market and competitive response of the retailers who are vertically and horizontally integrated. The lack of end market liquidity and depth work against the development of a spot market and indeed even if a regulated spot market were introduced it is unlikely that it would have sufficient liquidity to provide benefits in the way of market signals to encourage investment or demand side response. Further during a major supply shortage it is important that all participants work together to ensure all gas is made available to the market both in the form of gas released through curtailment of certain classes of customers and additional gas from production facilities or storage. We believe it unlikely that a spot market forced through legislation will encourage all available gas to be offered to the market and without genuine liquidity in a spot market it will not provide market based price signals to encourage investment.

The lack of market liquidity and lack of a spot market does not however reduce the capacity for an appropriate gas shortfall protocol to be developed with industry which will encourage the much needed pre-investment discussed previously. First however it is important to recognise that the majority of gas, particularly in the south eastern States, is provided to customers through a group of retailers having unique contractual relationships throughout the supply chain. It is the retailers who must coordinate both supply and demand side responses during a gas shortage via curtailment of customers and obtaining additional gas supplies. Retailers are vital to providing an appropriate emergency protocol. Retailers should be encouraged to develop contractual mechanisms that can manage all but the most acute gas supply shortage. Such contractual mechanisms would include on the supply side,

- spot or "as available" supply contracts with a range of producers to ensure that necessary contractual arrangements are in place prior to an incident,
- a supply portfolio approach to including gas from different basins and utilising different transmission pipelines

and on the demand side,

- interruptible contracts with their industrial customers,
- a clear Government endorsed customer curtailment seriatim,

- a mechanism for assisting industrial customers to trade their capacity allocations during a gas shortage, and
- a process for customer curtailment.

While Governments may have had some initial concerns over the information flow during the early stages of the Cooper Basin incident, pre-negotiated contractual arrangements with Gippsland producers were instrumental in ensuring additional gas was rapidly provided and flowed to South Australia. In that case it was unfortunate that unforeseen transmission and distribution pipeline capacity bottlenecks reduced the actual volumes that could reach NSW and South Australia. However pre-negotiated "as available" contracted call options for gas can be an effective mechanism for managing gas supply shortfalls, including pricing. Indeed ExxonMobil would contend that the market demonstrated its ability to manage the Cooper Basin supply shortfall incident, with perhaps the only area of weakness being that pre-planning had not resolved the key bottlenecks in the transmission system.

The relevant questions then are:

- (a) How can Governments and industry best ensure that contractual arrangements are put in place by retailers and other industry participants to manage supply shortfall situations?
- (b) How can Governments gain information during a gas shortage to keep up to date with developments?
- (c) How can Governments facilitate the industry pre-planning and system debottlenecking such that industry can manage gas shortfalls?
- (d) When is an incident critical enough for Government intervention to be required?

ExxonMobil believes these issues are best tackled through a retailer code of practice and a Government / industry emergency response protocol.

A retailer code of practice should require each retailer to develop plans for the management of gas supply shortages with such plans registered on a confidential basis with a Government body. This would provide Governments with transparency and sufficient information to ensure confidence in industry's ability to manage a gas supply shortfall. The retailer code of practice could provide standards for the retailer to follow in developing their plan, including guidelines for ratios of firm and interruptible demand, a customer curtailment seriatim, a customer trading system, a supply coverage ratio requiring "as available" call options on additional gas supply, and gas transportation options. To allow retailers to have flexibility to develop a plan unique to their circumstances, retailers could be required to develop their plan based on a combination of these standards balanced to meet some overarching criteria and to take account of the more likely shortfall events.

The emergency response protocol could provide guidelines for

- the registration of the retailer plans with a Government body,
- communication and information flow during a supply shortage,

- identification of responsible personnel from all industry levels and Governments, and
- most critically, defining when Government intervention is required and how it should be enacted.

The protocol could also prescribe industry emergency simulation exercises to test the management of potential gas shortage scenarios and to identify system weaknesses and areas for further improvement.

With retailer pre-planning under a code of practice, registration of such plans with Government and an emergency protocol defining communications and information flow, Governments should be sufficiently confident to ensure their intervention under emergency powers is only required in dire emergencies to safely stabilise the system and support critical loads. Any Government intervention prior to this point in time risks suppressing market signals and responses that are vital to encourage further investment.

There is however one key area in which Governments have a role in assisting the planning and management of supply shortfalls. Governments have an important role in assisting in the holistic identification of system weaknesses such as bottlenecks in pipeline systems. Governments should make it a priority to ensure such system bottlenecks are removed by allowing appropriate returns to encourage private investment in what may be normally under-utilised assets. Retailer supply shortage plans may also drive the contracting of such back-up capacity and associated investment.

Ultimately it is the valuing of security of supply by end use customers that will be key to the management of supply shortage and will drive industry investment. It is therefore vital that the additional costs for providing more secure supplies be passed on to customers on the basis of their required service level. Government imposed retail price caps must be removed and retailers must be allowed to differentiate gas pricing in the market on the basis of their customers' required security of supply service level.

Depending on the severity of an emergency it may be necessary for customers to be curtailed to differing degrees. If retailers are to put in place these protocols they need confidence that Governments have also committed to a protocol on when and how they will intervene. For example a curtailment protocol is useless if in the event of an emergency a State government declares that residential consumers will not be impacted or that prices will not rise. Government's must also commit to the protocol and stick to it.

#### HOW CAN INFORMATION ON SUPPLY AND DEMAND BE SHARED?

Comment is sought on:

*What is the supply capacity available to meet gas supply shortfalls i.e. reserve margins?*

*How could this be estimated and made available to responsible agencies?*

*Which option would provide the most effective exchange of information in an emergency?*

*Are there options in addition to those above which should be considered?*

*What information should be shared and by/with whom?*

*When should information be shared?*

Key to the management of emergency supply shortfalls is the flow of up to date information during the course of the emergency. Information such as pipeline pressures, current available pipeline capacities, current demand and available production capacity may all be beneficial for the management of an emergency. ExxonMobil does not consider however that

the ongoing, routine provision of such capacity information would be sufficiently useful to the industry or Governments. For each unique shortfall event, producers and pipeline owners will be able to optimise their systems to deliver the maximum possible gas into the system for that event. Such optimisation could not be identified or committed prior to an event and so any forecast would be only indicative and would not provide a good basis for decision making. Further there may be liability issues for any market participant providing forecast capacity numbers. Consequently, ExxonMobil considers that should there be a requirement for the ongoing provision of information, Governments should indemnify the market participants against claims by third parties who may seek to rely on that information.

The focus for an emergency protocol should be the provision of necessary information during an emergency to those market participants managing the issue and to Governments who may be required to act if the shortfall becomes acute. The protocol should define the required data, including interested parties, key contacts and types of information that should flow during an emergency. For efficient management it is important that only those parties affected and those who can ably assist with the management of the emergency be involved. It would be reasonable for a central agency such as VenCorp to act as a repository for all this information since VenCorp has staff with the requisite skills and who are routinely engaged in gas system operations.

#### WHAT ARE THE OPTIONS FOR TIMING OF GOVERNMENT INVOLVEMENT UNDER A PROTOCOL?

*Comment is sought on:*

*At what stage in a gas emergency would it be most appropriate for Government(s):*

*To receive information from industry?*

*To inform other jurisdictions with the potential to be affected or to provide assistance?*

*To become involved in decision making for sharing limited gas supplies?*

*To give directions to gas suppliers and consumers?*

*What criteria and/or circumstances should be used to trigger the involvement of Governments in gas emergencies?*

As discussed above, to ensure that vital industry investment occurs to better secure and deepen energy supplies it is critical that Governments refrain from intervening too early during gas shortages. Governments should only intervene as a last resort in an emergency when a gas shortage reaches the critical stage where drastic curtailment of the residential markets is required for stabilise the system and ensure supplies can be maintained to critical services such as hospitals. The emergency role of Government at this stage should be focussed on public safety and system security. Governments can in this circumstance ensure the highest compliance of curtailment by residential customers through legislated penalties and public announcements for consumers to cease using gas.

When gas supplies become critically low in one state, inter-Government coordination may also be required to assist with suppressing loads in another State. However this should only occur where shortages have become critically low.

#### WHAT ARE APPROPRIATE PRINCIPLES FOR GAS SHARING BETWEEN JURISDICTIONS?

*Comment is sought on:*

*What are the most appropriate principles for inter-jurisdictional curtailment?*

*Whether a "National" Curtailment Table should be established for use by system operators?*

The primary question above is developed from a flawed concept which is that jurisdictions should share gas. In reality, the decisions that need to be made involve sharing not between jurisdictions, but between gas consumers who may reside in different jurisdictions. From ExxonMobil's point of view, jurisdictional location should have no bearing on how to share gas between consumers. Commercial, legal and safety considerations must prevail.

As discussed above, it is critical that markets are allowed to develop market based solutions to supply shortages and emergencies and that industry investment is encouraged. This will only occur while established contractual rights regarding interstate sales are honoured. "Gas sharing" by consumers in different jurisdictions should be on a contractual basis only. With the interconnection of the gas transmission system particularly in the southeastern states, the diversification of gas supply by retailers across state boundaries and the growing number of supply sources, there are now several gas supplies from different sources into each major city. Subject to the removal of bottlenecks within the key transmission systems and interconnects, there are now opportunities for retailers and other major customers to develop greater depth of contracted supplies to ensure backup "as available" gas can be readily introduced to mitigate the impact of a supply shortfall. As described above, we believe that the retailers under an industry code should be required to develop a balanced supply shortfall management plan with curtailment schedules and back-up "as available" gas supply coverage. These retailer plans should form the basis for market curtailment. However it is important that such plans are formed on the basis of industry developed principles that meet defined Government objectives. As a natural consequence of the markets becoming increasingly interconnected and supplies more diversified, retailers are operating in multiple states. Consequently, there is increasing incentive for equitable cross-jurisdictional curtailment as affected retailers share reduced supplies. Ultimately if a supply shortage becomes acute and cannot be stabilized through retailer management, Governments may need to act in a coordinated inter-jurisdictional manner for system security and public safety. The principles for the timing and coordination of such inter-jurisdictional Government action should be set out in the emergency protocol. In order to secure the system in one state during a critical supply emergency it may be necessary as a last resort for Government curtailments to be imposed in a less affected State. The protocol should also document a curtailment table for such last resort inter-jurisdictional curtailment. The protocol must however specify that such Government inter-jurisdictional curtailment intervention in the market will only occur as a last resort for system security and public safety.

#### HOW SHOULD DEMAND FOR GAS-FIRED POWER GENERATION BE MANAGED DURING AN EMERGENCY?

*Comment is sought on:*

*What principles should apply to curtailment of gas-fired generators?*

Gas fired generators should be treated the same as other large industrial customers that have contracted gas supplies on the same service level basis. By far the majority of power generation is coal fired and for the most part gas fired generation takes up a peaking or upper intermediate position in the electricity pool. Based on the current electricity price driven by coal, it is unlikely that Gas fired Generators would choose to pay higher supply costs to obtain a higher supply security service level. Further it would be highly unlikely that at the time of a gas supply shortfall, there would also be critically low availability of coal fired generation. If retailers established a mechanism for trading of gas between large industrial sites, gas fired generators would likely find it financially beneficial to offer their gas to other large industrial customers who would place a higher value on that gas. The more flexible gas

fired generators are capable of running on liquid fuels in the event of a gas shortage or gas price spike.

It should also be remembered that for many end consumers, security of electricity supply is more important than security of gas supply. Where there is electricity generation shortage, the curtailment of gas fired generation to support the gas industry may cause significant and widespread impacts. We conclude that gas fired power generators should not be treated differently to other customers on a similar contracted service level.

#### HOW CAN MARKET PARTICIPANTS' COMMERCIAL RIGHTS BE BETTER RECOGNISED?

*Comment is sought on:*

*How can participants' commercial rights be better recognised under gas emergency conditions?*

As discussed previously, to ensure the necessary investment to better equip the market to manage gas supply shortfalls it is vital that Governments refrain from making directions that may be counter to the commercially agreed contractual rights of participants. Typically, costs will be passed through to consumers at a level consistent with the level of supply security they require. We believe that through our proposed retailer industry code which would contain detailed gas shortage plans, Governments will be less inclined to act to over rule such commercial arrangements. When Governments need to intervene as a last resort for system security and public safety, they will need to impose penalties on residential customers to ensure broad curtailment compliance. Governments will also need to provide legislative protection to both retailers and producers for actions that their customers may take against them for failure to supply. In some circumstances, it may be appropriate for Government to provide compensation to end users that have been curtailed.

#### ARE CURRENT JURISDICTIONAL EMERGENCY POWERS EFFECTIVE?

*Comment is sought on:*

*Does the structure of current jurisdictional emergency powers present a barrier to co-operative emergency management?*

*Are there specific aspects of any jurisdiction's emergency powers that present barriers to co-operative emergency management?*

*What assistance can jurisdictions provide to one another during an emergency?*

The current State based legislated emergency powers are dangerously parochial in what is fast becoming a national energy market. These powers provide State Governments with the ability to withhold gas from interstate sale. Exercise of these powers presents a barrier to the co-operative emergency management where one State may very significantly impact the economy of another State in order to protect its own electorate. Consumers in those States largely or entirely reliant on gas produced in another State are thus greatly exposed in an emergency regardless of the effective service level of supply they may have contracted. ExxonMobil believes that any development of a national protocol for management of supply emergencies should effectively override the powers of the individual States so that a nationally coordinated response can be affected.

It is interesting to note that prior to the publishing of this Issues Paper the South Australian Government developed and legislated changes to its emergency powers that appear to

strengthen its ability to direct gas to protect its own market. This pre-emptive action appears counter to the notion of a national emergency response protocol.

As stated previously ExxonMobil believes that Governments should only exercise emergency powers as a last resort for system security and public safety. In these cases the powers of Governments should be directed towards curtailment of loads to support the system and not towards directing gas production to the detriment of another State.

#### WHAT IS THE MOST APPROPRIATE SCOPE, FORM & CONTENT FOR A PROTOCOL?

Comment is sought on:

*Does this scope capture all relevant issues?*

*Should development of a Protocol take account of regional differences?*

*What is the most effective form for applying the National Gas Emergency Protocol?*

*How should industry be involved in the Protocol?*

*Are there other matters that should be covered by the Protocol?*

*How should the Protocol deal with the above issues?*

The scope of the protocol must cover both cross border and intra-jurisdictional issues. The protocol must be developed in conjunction with industry and must recognize the importance of commercial obligations and market based management of shortfalls. To this end the protocol should limit intervention by Governments to last resort system security and public safety emergencies. The protocol should provide for an agreed curtailment of loads through a documented curtailment schedule. State Governments should not direct gas production contrary to contracted commitments.

The protocol should define what circumstances would constitute a gas emergency. Clearly this should only contemplate severe gas shortages brought about by a specific major incident and not simply a day of higher demand than supply.

The protocol should provide details of who should be involved in the management of an emergency and define communication and information flows including the type of information. For the efficient coordination of an emergency response the interested parties should be restricted to those necessary to manage the specific event. Roles and responsibilities for those involved in managing the emergency including interested parties, market participants and Governments should be documented. Industry must be closely involved in the development of the protocol.

As discussed in previous sections, we believe there is merit in retailers having a detailed emergency response plan that includes curtailment schedules, customer trading mechanisms and "as available" gas supply contracts. The emergency response protocol could provide guidelines for the registration of the retailer plans with a Government body. The protocol could also prescribe industry emergency simulation exercises to test the management effectiveness of potential gas shortage scenarios.

#### WHAT ARE THE MOST APPROPRIATE / EFFECTIVE EMERGENCY COMMUNICATIONS PROTOCOLS?

Comment is sought on:

*What needs to be communicated in the event of a gas supply emergency?*

*Are existing jurisdictional communications arrangements with industry a suitable basis for inter-jurisdictional communications?*

In the event of a supply emergency it is important that communications and information can flow rapidly between industry participants and Governments required to manage the emergency. It is important that the number of people involved is minimised. The protocol should detail the core parties and set out the necessary qualifications for others who may be required to manage the emergency.

The protocol should describe when and how affected parties to an emergency should report to Government. As discussed elsewhere in this submission, Government intervention should be limited to last resort actions and the protocol should not only provide guidance as to when this should occur but also provide guidance on the appropriate communication required to initiate the Government directives.

The protocol should also describe the type of information that should be shared on a confidential basis to assist the parties in managing an emergency.

#### WHAT SUPPORT MECHANISMS ARE NECESSARY?

*Comment is sought on:*

*Would a National Gas Supply Plan enable emergencies to be better managed?*

*What are the costs and benefits of appointing a National Gas Emergency Co-ordinator?*

*Is an industry Code of Conduct or equivalent necessary to facilitate information sharing in an emergency?*

There may be merit in a voluntary industry based retailer code establishing emergency planning guidelines that ensure pre-planning of curtailments, customer trading and importantly back-up "as available" supply contracts.

Industry members need to be closely involved in system planning and the arrangements for emergency coordination. Government should establish an industry consultative process for the establishment of these procedures. Such a Government coordination role should not include centralised planning and management during an emergency, but it could provide a valuable facilitation role to assist industry coordination in these vital areas.

Governments have a role in ensuring the appropriate industry returns for debottlenecking the system where such investments in normal course may not be justified. We believe the role of Governments in removing barriers to investment both in the upstream production and in downstream areas is critical to the industry's effective management of emergencies. We provided further discussion on the barriers to investment in our response of 17 September 2004 to the MCE paper on Principles for Gas Market Development. In this paper ExxonMobil proposed that reforms in the following areas would further significantly encourage investment in upstream exploration and development of new gas supplies.

- removal of barriers to acreage access
- streamlining regulatory approvals for exploration / development of new gas
- enhancing market access
- providing greater certainty & reduced risk for pipeline developers
- reducing regulatory burden
- tuning corporate tax and Petroleum Resource Rent Tax to remove discrimination against large gas projects
- making exploration / development more attractive by modifying PRRT parameters
- providing PRRT rebates to gas power producers to ensure a level playing field between gas and coal fuel sources