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Our Reference: MN SU 01

Mr Steve Rodgers
Governance Section
National Energy Market Branch
Department of Resources, Energy and Tourism
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Exposure Draft of Retail Gas Market (Victoria) Procedures

Dear Mr Rodgers

Multinet appreciates the opportunity to provide comments on the Retail Gas Market (Victoria) Procedures which the Ministerial Council of Energy's (MCE) Australian Energy Market Operator (AEMO) Implementation Steering Committee (ISC) has released for consultation.

Multinet is supportive of the minimal changes to the current (Victorian) Gas Retail Market Rules in generating the new Retail Gas Market (Victoria) Procedures. Multinet re-iterates its comments made to you earlier in the week regarding the lack of transparency in the amendments. Unless the amendments are clear to all stakeholders about what is being changed, there is the potential that certain changes are not consulted on effectively or inadvertent errors may occur. Where existing procedures are used as the base for generating new procedures we would appreciate tracked changes versions in order to facilitate more effective and transparent consultation.

We have the following three comments to make on the draft Retail Gas Market (Victoria) Procedures.

Clarify the purpose and application

We recommend re-inserting clauses in section 1 which provide context to the document regarding its purpose, application, effective date etc. This should also make it clear that this applies to the Victorian PTS and some/all of the non PTS in Victoria.

Providing the context to the document is consistent with the procedures documented in the national electricity market. Facilitating an improved understanding of the purpose and application of the document will help stakeholders to reduce regulatory costs.

Tariff zone

A new definition, tariff zone has been used to replace distribution zone.

tariff zone has the meaning given to that term in the *Distributor's* applicable access arrangement.

It is unclear why this amendment has been introduced. The word tariff is generally understood as the traditional network tariffs V, D and more recently, L and this is already covered as a MIRN database requirement in 3.1.1 (j).

The amendment may also have repercussions for field names, aseXML conventions and business to market communications. Unless this change is aligning to the current aseXML and GIP requirements it should not proceed until it is approved via the normal working group and RMCC processes.

Minor Drafting Amendments

We suggest the following amendments:

- Reformat 4.1.2 to a sub clause a) and b)
- Reintroduce the divisor into the NSL calculations in Attachment 6 c, clause 2.2.2.

Should you have any questions regarding this submission, please do not hesitate to contact me on (03) 8540 7819.

Yours sincerely

Verity Watson
Manager Market Regulation