

NEMMCO

**National Electricity Market
Management Company Ltd**

ABN 94 072 010 327

Sydney Office

12 November 2008

Manager MCE Secretariat
Department of Resources, Energy and Tourism
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By email: MCETMarketReform@ret.gov.au

Retailer of Last Resort Draft Consultancy Report

Thank you for the opportunity to comment on the NERA / AAR draft consultancy report of 30 September 2008 on the Retailer of Last Resort (RoLR) review of current jurisdictional arrangements and development of a national policy framework.

NEMMCO has no comment to make on the proposed policy framework, but we recommend that implementation proposals should ensure that RoLR decision-making can proceed within the very short timelines that NEMMCO is required to follow when suspending a market customer from the market. We note the NERA / AAR proposal for a voluntary RoLR process to exist as well as the default RoLR process. To ensure that an operational way forward is always available, we recommend that the arrangements should allow NEMMCO to use the predefined default RoLR or combination of RoLRs if no instruction is received to use an alternative, or if operational circumstances prevent the use of a voluntary RoLR within the decision-making timelines of the National Electricity Rule Default Procedure that NEMMCO is required to apply under Rules clause 3.15.21.

Please feel free to contact me on (02) 9239 9106 if you wish to discuss this submission.

Yours sincerely,



Murray Chapman
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Ltr to MCE on RoLR Policy Framework 081112

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