

Attachment A: Stakeholder feedback template

Submission from [*Panos Priftakis, Snowy Hydro*]

The template below has been developed to enable stakeholders to provide feedback on Stage 2 of the development of the reliability and supply adequacy framework for the east coast gas market.

As noted in the consultation paper, Officials have not yet formed a view on whether a reliability standard, additional monitoring and communication tools or reliability and supply adequacy tools should be included in the framework. Officials are therefore interested in stakeholders' views on whether they think there is merit in including one or more of these additional elements in the framework and, if so, how they should be designed and implemented (e.g. as a package or sequenced in a particular way). There may of course be other options that are not identified in this consultation paper, which Officials would welcome feedback on.

Officials strongly encourage stakeholders to use this template, so that it can have due regard to the views expressed by stakeholders on each issue. If you wish to provide additional feedback outside the template, wherever possible please reference the relevant question to which your feedback relates.

Chapter 2: Reliability Standard

No.	Questions	Feedback
Section 2.2: Questions on the potential need for and role a reliability standard could play		
1	Do you think there is value in including a gas market reliability standard in the reliability and supply adequacy framework? Please explain your response.	
2	What, if any, impact(s) do you think the introduction of a gas market reliability standard could have on market participants and the market more generally?	
3	Qualitatively, what do you think the main costs, benefits and/or risks would be of implementing a gas market reliability standard?	
4	Do you think a reliability standard is the appropriate solution to address the potential problems set out in section 2.2.1, or are there other alternatives that you think should be considered by Officials? If there are other alternatives you think should be considered, please outline what they are and explain why you think they are more appropriate.	
Section 2.3.1: Questions on reliability standard design options		

No.	Questions	Feedback				
5	<p>If a decision is made to implement a gas market reliability standard, what form do you think it should take:</p> <ul style="list-style-type: none"> a. A USG standard with either: <ul style="list-style-type: none"> i. a common standard that applies across the east coast (Option 1a)? ii. different standards for northern and southern jurisdictions (Option 1b)? b. A peak demand standard with either: <ul style="list-style-type: none"> iii. a common standard that applies across the east coast (Option 2a)? iv. different standards for northern and southern jurisdictions (Option 2b)? c. A deterministic N-1 redundancy standard that focuses on the resilience of the supply infrastructure (i.e. production, storage or transportation infrastructure) in the east coast or on a northern and southern jurisdictional basis to either: <ul style="list-style-type: none"> i. an outage of the largest supply infrastructure in the east coast or on a regional basis (i.e. in northern jurisdictions and southern jurisdiction basis (Option 3a)? ii. an outage of individual components of key infrastructure (Option 3b)? d. A combination of options 1 and 2 (i.e. a dual annual USG and a peak demand reliability measure), with either: <ul style="list-style-type: none"> i. common standards that apply across the east coast (Option 4a)? ii. different standards for northern and southern jurisdictions (Option 4b)? e. A combination of options 1, 2 and 3 (i.e. a tripartite annual USG, peak demand and N-1 redundancy measure), with either: <ul style="list-style-type: none"> i. common standards that apply across the east coast (Option 5a)? ii. different standards for northern and southern jurisdictions (Option 5b)? f. Another option not identified in the consultation paper? If you think another option should be considered, please explain what the standard is and why you think it would be more appropriate than the options listed above. <p>Please explain your responses to these questions and any views you may have on the levels at which these standards should be set.</p>					
6	<p>If you think a USG standard (Option 1) should be implemented, do you think it will be capable of identifying potential shortfalls in peak day deliverability?</p>					
7	<table border="1"> <tr> <td data-bbox="159 1217 416 1297">If a peak demand standard was to be used under either Options 2 or 3:</td> <td data-bbox="416 1217 1122 1297">a. Do you think a 1-in-2 year, 1-in-10 year or 1-in-20 year standard should be adopted? Please explain your response.</td> </tr> <tr> <td data-bbox="159 1297 416 1377"></td> <td data-bbox="416 1297 1122 1377">b. Do you think a different peak demand standard should apply to GPG? Please explain your response.</td> </tr> </table>	If a peak demand standard was to be used under either Options 2 or 3:	a. Do you think a 1-in-2 year, 1-in-10 year or 1-in-20 year standard should be adopted? Please explain your response.		b. Do you think a different peak demand standard should apply to GPG? Please explain your response.	
If a peak demand standard was to be used under either Options 2 or 3:	a. Do you think a 1-in-2 year, 1-in-10 year or 1-in-20 year standard should be adopted? Please explain your response.					
	b. Do you think a different peak demand standard should apply to GPG? Please explain your response.					
8	<p>If an N-1 redundancy standard was to be used, do you think it should assume an outage of the largest supply infrastructure or sub-components of that infrastructure?</p>					

No.	Questions	Feedback
9	Are there any specific matters you think need to be considered when estimating a gas VCR?	a. Do you think widespread and long duration outages likely to be more relevant in gas than they are in electricity and should be factored into the gas VCR?
	b. Do you think an east coast wide VCR should be estimated, or do you think separate VCRs should be estimated for: <ul style="list-style-type: none"> i. each region (i.e. for southern jurisdictions and northern jurisdictions)? ii. each jurisdiction? 	
10	Do you think the reliability standard should apply to natural gas only or could it apply to other covered gases that are suitable for consumption as natural gas (e.g. biomethane)? If it were to apply to other covered gases that are suitable for consumption as natural gas, what, if any effect, do you think this could have on the development of renewable gases?	
11	Are there any specific matters that you think need to be considered when determining the level of a gas market reliability standard?	
Section 2.3.2: Questions on governance arrangements for a reliability standard		
12	Do you think that the governance arrangements for the reliability standard should be based on the standard NGR governance arrangements with: <ul style="list-style-type: none"> – the AER responsible for estimating a gas VCR; and – the reliability standard specified in the NGR and the AEMC responsible for considering any rule changes related to the reliability standard and facilitated market parameters? If not, please explain why.	
13	Do you think there is a need to provide for periodic reviews of the reliability standard and facilitated market parameters? If so, who do you think should undertake these periodic reviews: <ul style="list-style-type: none"> a. the AEMC in consultation with market participants and market bodies? b. a gas market reliability panel? 	
14	If you think a gas market reliability panel should undertake the reviews, please set out:	a. What you think the benefits would be of establishing such a panel relative to the AEMC undertaking the reviews in consultation with market participants and market bodies.
	b. If you think those benefits are likely to outweigh the costs and risks of establishing and maintaining such a panel.	

No.	Questions	Feedback
15	Are there any other governance options that you think should be considered?	
Other feedback		
	Please set out any other feedback you may have on a gas reliability standard here.	

Chapter 3: Monitoring and communication tools

No.	Questions	Feedback
Section 3.2: Questions on the need for and role of additional monitoring and communication tools?		
16	gas PASA	a. Do you think there is value in providing for a gas PASA in the reliability and supply adequacy framework? Please explain your response.
		b. What, if any, impact(s) do you think the introduction of a gas PASA could have on market participants and the market more generally?
		c. Do you think a gas PASA is the appropriate solution to address the potential problems set out in section 3.2.1, or are there other alternatives that you think should be considered by Officials? If there are other alternatives you think should be considered, please outline what they are and why you think they are more appropriate.
17	objective threat signalling mechanism	a. Do you think there is value in providing for an objective threat signalling mechanism in the reliability and supply adequacy framework? Please explain your response.
		b. What, if any, impact(s) do you think the introduction of such a signalling mechanism could have on market participants and the market more generally?
		c. Do you think an objective threat signalling mechanism is the appropriate solution to address the potential problems set out in section 3.2.1, or are there other alternatives that you think should be considered by Officials? If there are other alternatives you think should be considered, please outline what they are and why you think they are more appropriate.
18	advance notice of closure for supply infrastructure	a. Do you think there is value in requiring an advance notice of closure for supply infrastructure mechanism in the reliability and supply adequacy framework? Please explain your response.
		b. What, if any, impact(s) do you think the introduction of such a notice could have on market participants and the market more generally?
		c. Do you think an advance notice of closure requirement for supply infrastructure is the appropriate solution to address the potential problems set out in section 3.2.1, or are there other alternatives that you think should be considered by Officials? If there are other

No.	Questions		Feedback
		alternatives you think should be considered, please outline what they are and why you think they are more appropriate.	
Section 3.3.1.1: Questions on gas PASA regional boundaries			
19	<p>a gas PASA was to be implemented :</p>	<p>a. What approach to determining regional boundaries do you think would be of greatest use to market participants in terms of effectively conveying information on the nature of any reliability or supply adequacy threats?</p> <p>b. Do you think the regional boundaries should be the same as between an ST and MT gas PASA, or is there value in using smaller regions for an ST PASA?</p> <p>If you think there is value in using smaller regions for the ST gas PASA, please set out some examples of what the breakdown could be.</p>	
Section 3.3.1.2: Questions on gas PASA timeframes			
20		<p>If a decision was made to implement a gas PASA, do you think there would be value in requiring AEMO to publish:</p> <p>a. an ST gas PASA?</p> <p>b. an MT gas PASA?</p> <p>Please explain your response</p>	<p>Snowy Hydro supports DCCEEW position that the ST PASA being developed using existing information sources. We however do hold concerns with the MT PASA requiring additional information.</p>

No.	Questions	Feedback	
21	In relation to the information available to AEMO to prepare a gas PASA set out in Table 3.1:	a. Is there any additional information that you think AEMO would require to prepare an ST or MT gas PASA that has not been included in this table?	
		b. What approach do you think should be used to forecast GPG demand for the purposes of an MT gas PASA? Please explain what this would involve.	
22	If an ST gas PASA was to be implemented:	a. Do you think that a rolling 7-day outlook with a daily resolution updated daily (or more frequently if there is a material intra-day change) should be adopted? If not, please explain why and what timeframes you think would be more appropriate.	
		b. Do you think there would be value in providing for intra-day resolution for the DWGM? If so, is it likely to result in any additional reporting obligations?	
		c. Qualitatively, what do you think the main costs, benefits and/or risks would be of implementing an ST gas PASA?	
23	an MT gas PASA was to be implemented:	a. What outlook period do you think should be adopted and why: <ul style="list-style-type: none"> i. a rolling 6 month outlook period? ii. a rolling 12 month outlook period? iii. a rolling 24 month outlook period? 	
		b. What do you think the main costs and benefits to market participants would be of the outlook period you think should be adopted?	<p>The proposed MT PASA information reporting requirements could become onerous, as a vast amount of data will need to be provided by retailers and GPG. We would support more detail around the potential for overlap with existing/pending reporting requirements across both electricity and gas markets, and the extent to which that information could be leveraged by AEMO to inform its view of the market for an MT PASA.</p> <p>The Consultation paper does briefly note that market participants have identified some potential overlaps and duplication in the information currently reported by market participants and other steps that could be taken to reduce the reporting burden, including potentially by requiring AEMO to forecast short term demand. Snowy Hydro agrees with the position that if there is a decision made to implement a PASA that there are steps taken to reduce the</p>

No.	Questions	Feedback
	<p data-bbox="344 225 1079 344">c. If a 12 or 24 month outlook period was to be adopted, which of the following options do you think should be used to extend the 6 month outlook period currently provided for by the disclosure obligations in Part 27 of the NGR and why:</p> <ul style="list-style-type: none"> <li data-bbox="389 355 1079 411">i. Supplement the existing disclosure requirements with AEMO modelling of forecast demand and supply (Option 2)? <li data-bbox="389 422 1079 738">ii. Amend the existing disclosure obligations in Part 27 of the NGR by either: <ul style="list-style-type: none"> <li data-bbox="427 496 1079 552">(1) Extending the disclosure obligations to 12 or 24 months (Option 3A)? <li data-bbox="427 563 1079 738">(2) Replacing the disclosure obligations with a principles based approach (similar to what the AEMC has implemented for the NEM ST PASA), which would allow AEMO, in consultation with industry, to determine what information should be reported and when it should be reported (Option 3B)? <li data-bbox="389 750 1079 805">iii. Targeted additional information requirements with regular reporting (Option 4)? <li data-bbox="389 817 1079 906">iv. Another option not identified in the consultation paper? If you think another option should be considered, please explain what it is and why you think it should be adopted. <p data-bbox="344 930 1079 1050">d. Do you think the MT gas PASA should have a daily resolution and be updated monthly (or more frequently if there is a material change)? If not, please explain why and what timeframes you think would be more appropriate.</p> <p data-bbox="344 1074 1079 1137">e. Qualitatively, what do you think the main costs, benefits and/or risks would be of implementing an MT gas PASA?</p>	<p data-bbox="1093 148 2016 212">reporting burden by removing any duplication or overlapping reporting obligation,</p>
Section 3.3.1.3: Questions on seasonal PASA reporting		
24	<p data-bbox="163 1238 1079 1390">Do you think there is value in requiring AEMO to publish a quarterly seasonal PASA report that would draw on information from the gas PASA, Bulletin Board, GSOO and VGPR modelling and include an assessment of things such as the adequacy of gas held in storage and emerging threats help inform the market participants' seasonal readiness plans?</p>	

No.	Questions	Feedback
25	a quarterly seasonal PASA report was to be developed, what would you like to see included in the report?	
26	Qualitatively, what do you think the main costs, benefits and/or risks would be of introducing this report?	
Section 3.3.2: Questions on threat signalling mechanism		
27	a decision was made to implement an objective threat signalling mechanism:	a. Do you think the threat levels described in section 3.3.2 (i.e. early warning, alert or emergency) should be employed, or are there more appropriate threat levels that you think should be employed?
		b. Do you think there should be an automatic link between the NEM and gas market threat signalling mechanisms? Or are other changes required to these two signalling mechanisms to recognise the increasing interrelationship between the markets?
28	Qualitatively, what do you think the benefits, costs and risks would be of implementing a more objective threat signalling mechanism?	
Section 3.3.3: Questions on advance notice of closure for supply infrastructure		
29	a decision was made to implement an advance notice of closure requirement:	a. Do you think it should be restricted to supply infrastructure (e.g. production, pipeline, compression and storage facilities), or are there other facilities you think it should apply to?
		b. What advance notice period do you think would be appropriate?
		c. Do you think penalties should apply to facility operators that fail to provide sufficient notice in the same way that they do in the NEM?
30	Qualitatively, what do you think the benefits, costs and/or risks would be of implementing an advance notice of closure requirement?	
Other feedback		
Please set out any other feedback you may have on additional monitoring and communication tools here.		

Chapter 4: Reliability and supply adequacy management tools

No.	Questions	Feedback
Section 4.2: Questions on the potential need for and role of additional management tools		
31	Do you agree with the findings from the:	<p>a. MJA study on contracting behaviour set out in section 4.2.3.1? If not, please explain your view.</p> <p>b. ACIL Allen study on demand response set out in section 4.2.3.2? If not, please explain your view.</p>
32	SA contracting obligation	<p>a. Do you think there is value in providing for an RSA contracting obligation in the reliability and supply adequacy framework? Please explain your response.</p> <p>Marsden Jacob Associates (MJA) has proposed a contracting obligation that could be used to proactively address threats by requiring retailers and/or GPGs to forward contract sufficient gas, transport, storage and/or demand response if the obligation is triggered. Snowy Hydro has certain concerns how the contracting obligation would work when it requires retailers and/or GPG's to forward contract sufficient gas and other services to cover their share of a forecast reliability gap. These concerns includes:</p> <p>b. What, if any, impact(s) do you think the introduction of an RSA contracting obligation could have on market participants and the market more generally?</p> <ul style="list-style-type: none"> ● It is unclear how retailers and/or GPGs in the east coast would meet firm RSA contracting obligations. <ul style="list-style-type: none"> ○ Gas supply is not significant across the southern jurisdictions so Snowy Hydro is unclear how participants would be able to contract firm RSA across the medium to long term. ○ More information is required on the concept of firm gas contracting through winter for GPG when the generator is not needed everyday, similar to 2023. <ul style="list-style-type: none"> ■ If there is an expectation that GPG have firm contracts then DCCEEW should clarify if there would be an exemption considered for a GPG which utilises a backup fuel. Learnings from the NEM should be taken into consideration. ○ Clarity should be provided on the volume that would need to be contracted? Eg is it forecast GPG running, or to run the plant at max for 24hrs, 12hrs or 6hrs? ○ Would the proposal be interlinked with the NEM Retailer Reliability Obligation?

No.	Questions	Feedback
		<p>It is important to consider that every GPG faces the uncertainty of a combination of factors which include;</p> <ol style="list-style-type: none"> 1. Not knowing how much you will need to run to hedge contracts or not having sold electricity contracts yet for later dates. 2. Not knowing exactly how much you can rely on diesel delivery if dual fuel <p>Modern GPG tend to operate as peaking assets, and some, including those owned by Snowy Hydro, have very low capacity factors. Consideration should be given to the cost impact of imposing contracting obligations on generators which may run for only a few days per year. Requiring GPG to contract firm gas, which typically has a take or pay obligation, will increase costs for those generators.</p> <p>Should the contracting obligation proceed, then the obligation must include the whole east coast gas market and not exclude the north. Consistency across the east coast reduces any complexities.</p>
		<p>c. Qualitatively, what do you think the main costs, benefits and/or risks would be of implementing an RSA contracting obligation?</p>
		<p>d. Do you think an RSA contracting obligation is the appropriate solution to address the potential problems identified in sections 4.2.2 and 4.2.3.1, or are there other alternatives that you think should be considered by Officials?</p> <p>If there are other alternatives you think should be considered, please outline what they are and why you think they are more appropriate.</p>
33	administered demand response mechanism	<p>a. Do you think there is value in providing for an administered demand response mechanism in the reliability and supply adequacy framework? Please explain your response.</p> <p>b. What, if any, impact(s) do you think the introduction of an administered demand response mechanism could have on market participants and the market more generally?</p>

No.	Questions	Feedback
	<p>c. Qualitatively, what do you think the main costs, benefits and/or risks would be of implementing an administered demand response mechanism?</p> <p>d. Do you think an administered demand response mechanism is the appropriate solution to address the potential problems identified in sections 4.2.2 and 4.2.3.2, or are there other alternatives that you think should be considered by Officials?</p> <p>If there are other alternatives you think should be considered, please outline what they are and why you think they are more appropriate.</p>	
34	<p>supplier of last resort mechanism</p> <p>a. Do you think there is value in building on the trading function by providing for a supplier of last resort mechanism in the reliability and supply adequacy framework? Please explain your response.</p>	<p>There are important tools that are currently available in the east coast gas market to manage reliability and/or supply adequacy threats which are all regulatory-based tools that are intended to be used as a last resort if the market fails to respond.</p> <p>Contracting firm gas can be difficult in Victoria, and as it can be in other States. Rather than impose a gas contracting obligation, a less distortionary approach would be to formalise the system of curtailment that occurred during the 2022 energy crisis. That is, during a future crisis, uncontracted gas powered generators (GPG) would be curtailed before GPG with firm injection rights. This would make the risk associated with the gas market more transparent which would assist market participants. It would also minimise the cost impact for consumers, compared to other options being considered.</p> <p>Currently AEMO is already able to intervene in the DWGM by taking any measures it believes are reasonable and necessary to overcome a threat to system security, including curtailing demand in accordance with the emergency curtailment list. Consideration should be given to augmenting and expanding this mechanism across the east coast gas market without the need for a completely new supplier of last resort mechanism. Snowy Hydro believes that the current gas market has solutions largely at hand which wouldn't require a complete re-design or any new mechanism.</p>

No.	Questions	Feedback
		<p>Imposing a supplier of last resort mechanism is likely to have material impacts on participants and the market which would flow through to consumers, much like the RERT has had in the NEM.</p>
	<p>b. What, if any, impact(s) do you think building on the trading function by providing for a supplier of last resort mechanism could have on market participants and the market more generally?</p>	<p>Should a supplier of last resort mechanism proceed, the proposal should not be focused specifically on southern jurisdictions but enable a broader range of threats to be addressed across the east coast. Consistency across all states is important.</p> <p>In addition, the supplier of last resort mechanism should only be used as a last resort safety net and the gas market should be left to deliver the economic level of bulk supply reliability to customers. Much like the NEM supplier of last resort (the RERT), there must be significant transparency and reporting requirements and clear cost recovery processes to minimise any significant cost issues arising from the supplier of last resort mechanism.</p> <p>AEMO should set out clearly, in advance, the instances and extent to which any new powers and functions are expected to be deployed, in order to provide certainty to market participants and to allow participants to mitigate any cost impact that must arise from AEMO's using the supplier of last resort mechanism.</p>
	<p>c. Qualitatively, what do you think the main costs, benefits and/or risks would be of building on the trading function by providing for a supplier of last resort mechanism?</p>	
	<p>d. Do you think a supplier of last resort mechanism is the appropriate solution to address the potential problems identified in sections 4.2.2 and 4.2.3.1, or are there other alternatives that you think should be considered by Officials?</p> <p>If there are other alternatives you think should be considered, please outline what they are and why you think they are more appropriate.</p>	
35	<p>Are there any other reliability and supply adequacy management tools that you think should be considered by Officials? If so, please explain why you think they are required.</p>	
<p>Section 4.3.1: Questions on RSA contracting obligation</p>		

No.	Questions	Feedback
36	<p>If a decision was made to implement an RSA contracting obligation, which of the following design options do you think should be implemented and why:</p> <ul style="list-style-type: none"> – A southern jurisdiction winter deliverability contracting obligation (Option 1)? – An east coast wide firm contracting obligation (Option 2)? – Another design option? If you think another option should be considered, please explain what it is and why you think it should be adopted. 	
37	<p>an RSA contracting obligation was to be implemented:</p>	<p>a. Do you think the obligations should apply to:</p> <ul style="list-style-type: none"> i. Retailers and GPGs? ii. GPGs only? iii. Retailers only? <p>Please explain your response.</p> <p>b. In the case of GPGs:</p> <ul style="list-style-type: none"> i. Do you think it would be financially viable for GPGs to be subject to an RSA contracting obligation? If not, are there any other simpler or more direct ways to address the reliability and supply adequacy threats posed by GPG demand? ii. What, if any effect, a contracting obligation or alternative approach could have on competition in the NEM? <p>c. Do you think a size threshold should be adopted for liable entities? If so, what do you think is an appropriate size threshold?</p> <p>d. Do you think any other reforms would be required to enable liable entities to contract on reasonable terms? If so, please explain what additional reforms you think are necessary.</p> <p>e. How far in advance of a forecast reliability gap do you think the RSA contracting instrument would need to be triggered to provide liable entities sufficient time to contract and for any investment that may be required?</p> <p>f. How should the geological, land access, regulatory, commercial and other investment challenges that may be associated with the development of new supply infrastructure be recognised in the contracting obligations and/or penalty regime?</p> <p>g. Do you think the contracting obligation should allow liable entities to procure other covered gases that are suitable for</p>

No.	Questions	Feedback
	<p>consumption as natural gas (e.g. biomethane and low hydrogen blends)?</p> <p>h. Do you think it would be necessary to provide for:</p> <p>i. A liquidity obligation? If so, please explain how you envisage this obligation would work.</p> <p>ii. A voluntary book build mechanism administered by AEMO to facilitate the development of any new supply and/or capacity that may be required? If so, please explain how you envisage this would work.</p> <p>i. Do you think the contracting obligation would incentivise retailers to help transition customers to alternative fuels (where feasible), or would a separate tool be required to achieve this?</p>	
38	<p>If a southern jurisdiction winter deliverability contracting obligation (Option 1) was to be implemented:</p> <p>a. Are there any additional design features that you think need to be considered (see Table 4.2)?</p> <p>b. Are there any design features that have been proposed that you think would not work in the east coast gas market (see Table 4.2)?</p> <p>c. Are there any material costs, risks or benefits associated with this option that you think should be considered?</p>	
39	<p>an east coast wide firm contracting obligation (Option 2) was to be implemented:</p> <p>a. Are there any additional design features that you think need to be considered (see Table 4.2)?</p> <p>b. Are there any design features that have been proposed that you think would not work in the east coast gas market (see Table 4.2)?</p> <p>c. Are there any material costs, risks or benefits associated with this option that you think should be considered?</p>	
Section 4.3.2: Questions on a potential administered demand response mechanism		
40	<p>If a decision was made to implement an administered demand response mechanism, do you think the design option described in section 4.3.2 should be implemented, or is there another option that you think could unlock demand response in a more cost effective way?</p>	
41	<p>the administered demand response mechanism</p> <p>a. Do you think it should only be open to large gas users to participate in, or should retailers and/or demand response aggregators also be able to participate?</p>	

No.	Questions	Feedback
	<p>described in section 4.3.2 was to be implemented:</p> <p>b. Do you think it would be necessary to make availability payments to panel members to encourage them to participate, or could they just be paid a pre-activation or activation payment?</p> <p>c. Are there any additional design features that you think need to be considered?</p>	
Section 4.3.3: Questions on supplier of last resort mechanism		
42	<p>If a decision was made to implement a supplier of last resort mechanism, which of the following design options do you think should be implemented and why:</p> <ul style="list-style-type: none"> – a southern jurisdiction winter deliverability supplier of last resort mechanism (Option 1)? – an east coast wide RERT-style supplier of last resort mechanism (Option 2)? – another design option? If you think another option should be considered, please explain what it is and why you think it should be adopted. 	
43	<p>relation to the risk of crowding out market participants:</p> <p>a. Do you think it feasible to AEMO to procure 'out of market' gas (i.e. gas that would not otherwise be available to the market) or other services (e.g. transportation and storage services)? If so, how would this occur and are there any risks associated with doing so?</p> <p>b. If it is not feasible to procure 'out of market' gas or other services, is there any other way that you think the risk of AEMO crowding out market participants could be addressed?</p>	
44	<p>Do you think:</p> <p>a. The supplier of last resort mechanism should only focus on natural gas, or should it also allow AEMO to procure other covered gases that are suitable for consumption as natural gas (e.g. biomethane and low hydrogen blends)?</p> <p>b. Any additional measures (over and above a causer pays approach to cost allocation) are required to counter the impact that AEMO acting as supplier of last resort may have on market participants' incentives to take their own actions to address the threats?</p>	
45	<p>a southern jurisdiction winter deliverability supplier of last resort mechanism</p> <p>a. Do you think AEMO should only be able to contract and/or hold a storage reserve for the winter period, or should it be able to contract for a longer period?</p>	

No.	Questions	Feedback	
	(Option 1) was to be implemented:	<p>b. Are there any additional constraints that you think should apply to this mechanism that have not been identified in Table 4.3?</p> <p>c. Are there any additional design features that you think need to be considered for this option (see Table 4.3)?</p> <p>d. Are there any design features that have been proposed that you think would not work in the east coast gas market (see Table 4.3)?</p> <p>e. Are there any material costs, risks or benefits associated with this option that you think should be considered?</p>	
46	an east coast wide RERT-style supplier of last resort mechanism (Option 2) was to be implemented:	<p>a. Are there any additional constraints that you think should apply to this mechanism that have not been identified in Table 4.3?</p> <p>b. Are there any additional design features that you think need to be considered (see Table 4.3)?</p> <p>c. Are there any design features that have been proposed that you think would not work in the east coast gas market (see Table 4.3)?</p> <p>d. Are there any material costs, risks or benefits associated with this option that you think should be considered?</p>	
ther feedback			
ease set out any other feedback you may have on reliability and supply adequacy management tools here.			

Chapter 5: Potential changes to the GSOO and VGPR

No.	Questions	Feedback
47	<p>Do you think there is value in aligning the GSOO and VGPR with the reliability and supply adequacy framework?</p> <ul style="list-style-type: none"> – If so, are there any changes contemplated in section 5.1 that you think are unnecessary, or are there other changes that you think should be considered? – If not, please explain why. – Are there any material costs, risks or benefits that you think should be considered when deciding whether or not to align the GSOO and VGPR with the framework? 	
48	<p>Do you think there is value in trying to achieve greater alignment between the GSOO, VGPR and NEM forecasting tools?</p> <ul style="list-style-type: none"> – If so, are there any changes contemplated in section 5.2 that you think are unnecessary, or are there other changes that you think should be considered? – If not, please explain why. – Are there any material costs, risks or benefits that you think should be considered when deciding whether to align the GSOO and VGPR with the NEM forecasting tools? 	
	Please set out any other feedback you have on the potential alignment of the GSOO and VGPR here.	

Implementation and other questions

No.	Questions	Feedback
49	If any of the additional elements outlined in the consultation paper were to be implemented, do you think they should be implemented as a package or sequenced in a particular way?	
50	Are there any other problems, impacts or matters that you think Officials should take into account when considering whether to include any of the additional elements outlined in the consultation paper?	