

1 July 2024

Gas Markets Team
Australian Energy Regulator
By email

To the AER Gas Markets Team

Day Ahead Auction Record Keeping Guideline Version 2

I refer to the above matter.

As stated in our submission to the first round of consultation, we are generally supportive of the changes proposed by the AER in the updated version of the DAA record keeping guideline.

We note that the AER is considering a three month implementation period and request that this be extended to six months for the following reasons:

1. The substance of the reforms does not require urgent implementation;
2. In this current environment there is a high level of regulatory and policy reform that necessitates continuous IT development and utilises constrained or limited resources for most participants. Therefore, while three months may be sufficient to deliver such changes in a vacuum, such works need to be scheduled and prioritised amongst other projects that may have more immediate implications for compliance and power system security;
3. There is a reasonable probability that the implementation period will fall over Christmas with the associated IT change freezes and resourcing implications for that period.

If you have any questions please contact me at hugh.ridgway@alintaenergy.com.au.

Yours sincerely

Hugh Ridgway
Wholesale Regulatory Manager (East Coast)