



4 February 2010

Executive General Manager - Financial and Business Services
Australian Energy Market Operator (AEMO)
Level 12, 15 William St
Melbourne VIC 3000

By email: sttm@aemo.com.au

Attention: Ms Karen Olesnicky

Dear Karen

CONSULTATION; STTM PARTICIPANT FEE STRUCTURE AND MAJOR GAS PROJECT DETERMINATION

As a large participant in the STTM, Origin Energy appreciates this opportunity to comment on the "STTM Participant Fee Structure Draft Determination" Issues Paper.

While Origin agrees with most of AEMO's decisions set out in the draft determination, we do not agree with its proposal to charge a fixed fee based on ABN. We do not see that this is cost reflective or appropriate. Several organisations need to subdivide their business (each with unique ABNs) for legal and governance purposes.

We do not believe that the subdivision of organisations incurs significant additional activity or resources for AEMO.

We therefore recommend that a single fixed fee be applied to an organisation regardless of the number of related corporate entities or ABN numbers registered.

Please contact me if you would like to discuss any of the issues raised in this submission.

I understand that AEMO proposes to publish submissions to this consultation. Origin gives its permission for AEMO to publish this submission in its entirety.

Yours Sincerely

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