



18 June 2019

[RRO@aer.gov.au](mailto:RRO@aer.gov.au)

Dear Sir/Madam,

**RE: Consultation on Draft Interim Contracts and Firmness Guideline**

Thank you for the opportunity to provide feedback on the draft interim Contracts and Firmness Guidelines for the Retailer Reliability Obligation (RRO).

Orora Ltd has entered into Renewable PPAs in South Australia, NSW and Victoria that are eligible for *grandfathering* under these guidelines (11.116.8).

In SA and NSW Orora's load is > 50GWh/yr and so is eligible to be a *large opt-in customer* for its SA and NSW loads; however, in Victoria Orora's annual electricity load is below 50GWh/yr and so under the RRO Rules Orora is ineligible to become a *large opt-in customer* for its Victorian load. (4A.D.4 of the NER).

This means that although Orora has a qualifying contract for its Victorian load, under the proposed guidelines, it is unable to make use of it to satisfy the reporting requirements of the RRO for its Victorian sites.

Orora requests that the Draft Interim Qualifying Contracts and Firmness Guidelines therefore be amended so that if a large customer has a load of 50GWh/yr in one or more region, then it can register as a *large opt-in customer* for all regions where it has load that is hedged by a Qualifying Contract.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Peter Dobney".

Peter Dobney  
GM Resources and Energy, Orora Ltd