## RC\_2013\_08: Clarification of GST Treatment

### Submitted by

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#### **Submission**

## 1. Please provide your views on the proposal, including any objections or suggested revisions

Community Electricity supports the Rule Change Proposal.

We consider that it is axiomatic that the Market Rules should comply with Commonwealth and State laws, and the fact that they have been non-compliant is a manifest error. In common with all manifest errors, the chosen remedy should be simple, fit-for-purpose and implemented with minimum cost and disruption.

We welcome the fact that the ATO is willing to accept a simple and staged remedy and specifically is not requiring the unwinding of several years of previous transactions.

We especially support the proposition 2.25.1B: "System Management and the Economic Regulation Authority must, if requested by the IMO, do all things reasonably necessary (including entering into any agreements) to enable the IMO to give effect to clause 2.25.1A [which appoints the IMO as their collection agent]. In particular, Market Participants fund all three 'agencies' which have a joint responsibility to deliver an efficient 'value for money' resolution to this issue. In particular, they should avoid the costs of additional administration and systems, and should bring this matter to a timely resolution.

# 2. Please provide an assessment, whether the change will better facilitate the achievement of the Market Objectives

Community considers that the Rule Change is a correction of a manifest error and enhances achievement of Market Objective d (minimising of electricity costs). It is otherwise harmonious with the other Market Objectives.

3. Please indicate if the proposed change will have any implications for your organisation, (for example changes to your IT or business systems) and any costs involved

The proposal has no implications for Community.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed

Not applicable

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