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Ref:JD/TF/AC

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Mr John Pierce  
Chairman  
Australian Energy Market Commission  
**PO Box A2449**  
**Sydney South NSW 1235**

Dear Mr Pierce

**RE: *Draft Determination – National Electricity Amendment (AEMO access to forecasting information) Rule 2015 (ERC0184)***

Ergon Energy Corporation Limited (Ergon Energy) welcomes the opportunity to provide comments to the Australian Energy Market Commission (AEMC) on its *Draft Determination – National Electricity Amendment (AEMO access to demand forecasting information) Rule 2014* (Draft Determination) and associated Draft Rule. This submission, which is available for publication, is made by Ergon Energy in its capacity as an electricity Distribution Network Service Provider in Queensland.

Ergon Energy is generally supportive of the AEMC's more preferable Draft Rule as it has the potential to improve the Australian Energy Market Operator's (AEMO) long term electricity demand forecasts, which in turn may assist in efficient investment decisions that benefit customers and other market stakeholders. However, Ergon Energy does have some concerns and consequently seeks some additional consideration by the AEMC of these issues.

In the proposed Draft Rule, it is not clear whether the information to be provided to AEMO in order to develop the forecasts is for example, raw data or processed data, or analysed forecasts. This may result in different forecasts from the same data sets without this specificity. As a member of the Energy Network Association (ENA) we support the ENA's submission and more specifically, their recommendation that provision be made in the National Electricity Rules for AEMO to publish the forecasts and the information used in preparing forecasts, subject to any confidentiality requirements. Furthermore, when publication occurs, AEMO should include data specificity that includes the period that the data was obtained.

The AEMC states in the Draft Determination that AEMO could not use its information gathering powers in the National Electricity Law to develop demand forecasts at points on a distribution network where this does not relate to planning and investment of a transmission network. However, Ergon Energy considers that the draft rule has not adequately captured this sentiment. As such, we recommend that clause 5.20.6(b) is amended to include specific reference to the connection point level on the distribution network as it relates to the planning and investment of a transmission network.

Should you require additional information, or wish to discuss any aspect of this submission, please do not hesitate to contact either myself on (07) 3851 6416 or Trudy Fraser on (07) 3851 6787.

Yours sincerely



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