



24 May 2013

Mr Trevor Johnston
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Project reference code : ERC0156
Email: submissions@aemc.gov.au

Dear Mr Johnston

RE: ERC0156 – PROVISION OF ZONE SUBSTATION DATA

CitiPower and Powercor Australia (**the Businesses**) welcome the opportunity to comment on the Australian Energy Market Commission's (AEMC) *Consultation Paper – National Electricity Amendment (Publication of zone substation data) Rule 2013 (Consultation Paper)*.

As the Businesses understand it, the proposal being made by the National Generators Forum would be to require distribution network service providers (DNSPs) to publish on their websites historical annual electricity load data for all zone substations within their networks. Whilst the Businesses could potentially provide such data, there are a number of issues with publication of this data that the AEMC should understand in terms of data formats, data quality and confidentiality for the Businesses.

Data formats

- Any data provided by the Businesses would only include historical usage by half hour at each zone substation. It would not, and can not, include other information such as demographics, photovoltaic penetration etc as the Businesses information systems do not record or support capture of such information;
- The data should be allowed to be provided in either MW or MVA. To mandate one form over the other would incur additional, and unnecessary costs on the Businesses;
- There should be no expectation that the data provided is temperature corrected. All data provided will be raw;
- To minimise the costs imposed on the Businesses by this Rule change, the website should only be required to be updated annually;
- The Businesses have a statutory responsibility to retain half hourly usage data by zone substation for 7 years. There should be no expectation (as is sought in the Rule change request) that data be held for 10 years as this will impose significant additional IT storage costs upon the Businesses;

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- There should not be an expectation where a zone substation has been in operation for a period of less than 7 years that 7 years of data be provided;
- Any specification in terms of how the data is presented should be simple. That is, data files should be able to be zipped to manage file sizes on the website; and
- The Businesses will not supply forecast half hourly zone substation usage data. To do so would potentially expose the Businesses to liability for accuracy of those forecasts.

Data quality

- Any data would necessarily have to be supplied on a ‘best endeavours’ basis. There will be data quality issues in terms of dips and gaps and it will be the responsibility of the user of the information address these issues, not the Businesses;
- There should be no expectation that the Businesses be responsible for responding to inquiries etc on this data. To do otherwise would again result in substantial costs being imposed on the Businesses;
- Load transfers between zone substations will be present in the data. Again there should not be an expectation that the Businesses will provide commentary on these load transfers; and
- There should be no expectation that the data provided will present a complete picture of the network. For example inter distributor transfers may not be picked up in the data.

Confidentiality

- Where there are less than 5 customers on a single zone substation, to preserve the confidentiality of those customers it will be necessary to aggregate that zone substation’s data with the next closest zone substation.

The Businesses emphasis that should the AEMC look favourably on this proposed Rule change, it needs to be highly cognisant of the costs it is potentially imposing on DNSPs. It must be convinced that the benefits of providing this data do not exceed the costs and to the extent DNSPs do incur costs in providing this data, there are avenues available to recover these costs.

The Businesses would be pleased to discuss their view on this proposed Rule change further. Please do not hesitate to contact me (03) 9683 4465 or bcleeve@powercor.com.au if you would like to discuss the positions presented in this submission further.

Yours sincerely



Brent Cleeve
MANAGER REGULATION