

3 October 2008

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Dear Dr Tamblyn

Draft Rule Determination – Parameter Values, Equity Beta and Gamma

Integral Energy welcomes the opportunity to put forward its views to the Australian Energy Market Commission (the Commission) on the draft Rule determination on the EUAA's proposed Rule "Parameter Values, Equity Beta and Gamma."

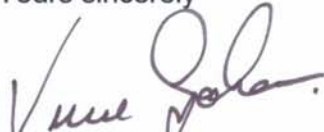
Integral Energy supports the Commission's draft decision to reject the Rule change originally proposed by the EUAA or the alternative change submitted during first round consultation.

Integral endorses the Commission's assessment of both:

- the legal, regulatory and policy risks inherent in making retrospective adjustments to parameter values to a regulatory review process that is already underway; and
- the potential for the Rule proposal to pre-empt and therefore prejudice the AER's upcoming parameter review.

Should you wish to discuss any aspect of this submission, please contact Michael Martinson on (02) 9853 4375.

Yours sincerely



Vince Graham

Chief Executive Officer

Going further for you is what we do