

10 September 2015

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235



Dear Mr Pierce

Draft Rule Determination: AEMO access to demand forecasting information (ERC0184)

Energex Limited (Energex) appreciates the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on its draft determination and rule allowing the Australian Energy Market Operator (AEMO) to prepare demand forecasts at the connection point and regional level as part of its National Transmission Planner (NTP) functions.

Energex is generally supportive of the draft rule determination as it will:

- Explicitly recognise demand forecasting at the connection point and regional level in the National Electricity Rules and remove any doubt that AEMO can request relevant information as part of its information gathering powers under the National Electricity Law; and
- Require AEMO to publish any forecast it has prepared and the information on which it is based.

However, while Energex is supportive of providing available demand forecasting information at the connection point level to AEMO, it is concerned that the draft rule does not impose any limitations on AEMO with respect to its information gathering powers.

As advised in Energex's submission on the AEMC's consultation paper, Distribution Network Service Providers (DNSPs) may not currently aggregate all demand forecasting data to a connection point level as network investment at this level is not the responsibility of the DNSP. Therefore, if AEMO compels DNSPs to provide aggregated information which is not currently available, additional costs will be incurred.

Consequently, Energex considers that before AEMO issues a market information order or market information notice, it should be required to:

- Consult with the DNSP on the availability of the information being requested; and
- Where aggregated information is not readily available, assess in coordination with the DNSP whether the benefits of providing the information are outweighed by the additional burden being imposed on the DNSP.

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As a member of the Energy Networks Association (ENA), Energex is also supportive of the comments made in the ENA's submission on the AEMC's draft rule determination.

Should you have any queries regarding this submission, please contact Leigh Henderson, Acting Network Regulation Manager, on (07) 3664 4118.

Yours sincerely

A handwritten signature in black ink, appearing to read "Neil G. Andersen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Neil Andersen
Group Manager Regulation and Pricing