7 September, 2007

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
Australia Square NSW 1215

Email: submissions@aemc.gov.au

Dear Dr Tamblyn

National Transmission Planner
National Transmission Planning Arrangements:
Scoping Paper – August 2007

Thank you for the opportunity to comment on the scope of the review to establish an enhanced transmission planning process. CitiPower and Powercor Australia are Victorian electricity distributors who are registered with NEMMCO as Network Service Providers under clause 2.5 of the National Electricity Rules (NER)

CitiPower and Powercor offer the following comments for your consideration in relation to the interaction between the National Transmission Planner and distribution businesses.

Currently the Victorian distribution businesses have responsibility for planning transmission connection and annually publish a joint Transmission Connection Planning report. The scoping paper contemplates that the current roles of VENCorp and ESIPC need not change, however, the paper is silent on the role of distribution businesses. The interface between transmission and distribution is very important and the role of distributors should be taken into consideration when reviewing the transmission planning function.

The transmission planning process should also consider ways of optimising the transmission and distribution functions. This will require close co-operation between the responsible planning bodies with adequate planning horizons to provide scope for effective optimization.

Should you require further information in relation to this submission, please do not hesitate to contact me on (03) 9683 4282

Yours sincerely

Rolf Herrmann
MANAGER REGULATION