

RECEIVED

07 DEC 2011



5 December 2011

Mr. Zaeen Khan

Australian Energy Market Commission

PO Box A2449

Sydney South

NSW 1235

Dear Mr Khan

**Proposal by the Energy Users Rule Change Committee (ERC 0134)**

Thank you for the opportunity to comment on the AEMC's Consultation Paper on the Rule Change Proposal submitted the Energy Users Rule Change Committee (RCC). I am writing to you to register Amcor Ltd's support for this rule change proposal.

Amcor is a large manufacturer in Australia with an energy bill of approximately \$100M/yr

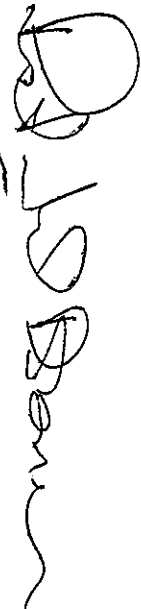
Amcor has become increasingly concerned about rising electricity prices. We agree with the finding by the Australian Energy Regulator, the Garnaut Review, the Independent Pricing and Regulatory Tribunal, the Energy Users Association of Australia and others that deficiencies in the design and conduct of economic regulation account for part of these price increases.

We support proposals to change the National Electricity Rules in order to strengthen incentives for efficient operation and investment by the network service providers operating in the National Electricity Market, and also to reduce excessive profits that are produced at the expense of higher electricity prices.

Amcor supports the principle proposed by the RCC that the allowed return on debt should as far as reasonable reflect the actual cost of debt. We agree with the RCC that these issues should be reviewed by the AEMC and prescribed in the National Electricity Rules, rather than left to periodic reviews by the AER.

We have confidence in the integrity of the AHMC's rule change process and commend the RCC's proposal to the AHMC. We will be taking an active interest in this proposal to change the National Electricity Rules and look forward to its transparent and comprehensive assessment against the National Electricity Objective.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Peter Dohney". The signature is written in a cursive style with a large initial "P" and a long horizontal flourish at the end.

Peter Dohney

Group Manager, Resources and Energy, Amcor