

28 January 2014

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



positive energy

Dear Mr Pierce

Draft Rule Determination: National Electricity Amendment (Publication of Zone Substation Data) Rule 2013 (ERC0156)

Energex Limited (Energex) appreciates the opportunity to provide a submission on the Australian Energy Market Commission's (AEMC's) draft rule determination relating to the publication of electricity load data for zone substations within distribution networks.

Energex generally supports the AEMC's draft rule determination that Distribution Network Service Providers (DNSPs) should make zone substation load data available based on the principle that analysis of this information will enable more informed decision-making and timely and efficient investments which will ultimately benefit the long-term interests of electricity consumers.

Energex has contributed to the Energy Networks Association's (ENA's) submission on the AEMC's draft rule determination and is supportive of the views contained therein. In particular, Energex considers that:

- 30 business days is a reasonable period of time within which to provide requested reports.
- It should be left to the discretion of DNSPs to decide whether zone substation load data should be aggregated or excluded if the information is considered to be confidential or commercially sensitive.
- The requirement to provide data, both historical and annual, should be aligned with the Distribution Annual Planning Report (DAPR) publication date which, in Queensland, is 30 September.
- DNSPs should be able to charge a reasonable fee for service and the Australian Energy Regulation (AER) should regulate the price as part of the regulatory determination process. With regard to transitional arrangements, Energex believes that the ability exists to charge for this service under current AER approved pricing arrangements for alternative control services.
- The rule should also include additional subparagraphs to the effect that:
 - (1) DNSPs are not obliged to provide further detailed network information beyond the raw data for analysis purposes;
 - (2) zone substation data provided is to be used for the purposes for which it has been provided and should not be passed on to a third party without the DNSP's consent; and

Enquiries

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- (3) any published material relying on zone substation data must prominently include a reference to the limitations of the raw data provided by DNSPs.

Energex appreciates the AEMC's consideration of the issues raised by DNSPs during the consultation process and does not have any significant concerns with the appropriateness of the key parameters of the proposed rule other than to suggest the inclusion of the additional subparagraphs referred to above.

Should you have any enquiries regarding this report please contact Neil Andersen, Group Manager Regulation and Pricing, on (07) 3664 4009.

Yours sincerely



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Finance, Regulation and Strategy