



30 May 2014

Mr Chris Pattas  
General Manager – Network Operations and Development  
Australian Energy Regulator,  
GPO Box 520,  
Melbourne Vic 3001

via website: AERInquiry@aer.gov.au.

## **Australian Energy Regulator – Submission on the audited and certified economic benchmarking RIN responses – published on 15 May 2014**

Dear Mr Pattas

Thank you for the opportunity to make a submission in response to the AER's publication of the audited and certified economic benchmarking RIN responses.

The ENA understands that the purpose of the consultation is to provide interested parties the opportunity to review the information and to provide advice to the AER which will assist the AER in developing its benchmarking techniques.

ENA member companies recognise the AER's requirement to undertake benchmarking, including producing the annual Benchmarking Reports. Network businesses are keen to work constructively with your staff to support access to robust business data and the development of improved information sources which clearly provide value in benchmarking analysis.

However, ENA is concerned that the timeframes for the completion of the economic benchmarking RINs by network businesses and the timeframes for the consultation on the RIN responses have both been unrealistically short. This approach is not conducive to establishing a sufficiently rigorous and comparable information base for the purposes of the AER which is well understood by stakeholders.

It is noted that the AER has provided only 11 business days for stakeholders representing consumers, major users, investors, market participants, energy networks and other stakeholders to consider the RIN responses to the AER request which has necessitated Basis of Preparation documentation totalling 1,600 pages in length. In the time available it is not practical for the ENA, or arguably any stakeholder, to digest the data and form an informed view on its fitness for the AER's purposes or for use in comparative analysis.



In this context, it is disappointing that the AER has not published the colour coding developed by the ENA and submitted by networks in their RIN templates. We designed this colour coding to aid the stakeholder review process, and it has been effectively precluded in the formatting constraints that the AER has placed on the consolidated RIN templates.

If you have any questions please do not hesitate to contact me on 02 6272 1510 or Jim Bain on 02 6272 1516.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'John Bradley', is positioned above the typed name.

John Bradley  
Chief Executive Officer