

4 February 2014

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
Level 5, 201 Elizabeth Street  
Sydney NSW 2000

### Draft Rule Determination, Publication of zone substation data

Dear Mr Pierce,

The Energy Networks Association (ENA) is pleased to comment on the Draft Rule Determination for the publication of zone substation data, which was released on 5 December 2013.

ENA is the national industry association representing the businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia. ENA members own assets valued at over \$100 billion in energy network infrastructure.

ENA supports the publication of zone substation data as proposed in the Draft Rule Determination. The publication of zone substation data is consistent with ENA's principle of supporting the release of information that is useful to market participants and that could improve the efficiency and transparency of the electricity market. According to the Australian Energy Market Commission (AEMC) the publication of zone substation data will allow interested parties to undertake empirical analysis and prepare forecasts of electricity demand at the sub-regional level, which is likely to lead to improved decision making by market participants.

The ENA has welcomed the opportunity to resolve the concerns raised in our initial submission with the National Generators Forum in an open and collaborative process facilitated by the AEMC. This has resulted in the substantial agreement between the NGF and the ENA that is reflected in the Draft Determination.

In response to the four implementation issues raised by the AEMC, the ENA considers that

- a standard 30 business day response is appropriate, to allow for a request to be made, fees to be paid and the zone substation data to be made available;
- the commencement date for the rule change should be the next Distribution Annual Planning Report (DAPR) for each network;
- it is appropriate that in the matter of confidentiality, it should be left to the discretion of DNSPs as to whether the data should be aggregated or excluded; and
- a fee should be charged for the provision of the data, that reflects the reasonable costs incurred by a distribution network in providing the data, which is consistent with the ENA's view expressed in our submission on the Consultation paper that "the additional costs of the publication of zone substation data should be fully recovered from the beneficiaries."

On the two additional matters raised by the AEMC some member businesses have expressed a range of views depending on individual circumstances. For example:

- in relation to the timing of the commencement of the final rule change, in its submission Ergon Energy has pointed to the implementation of a new system for load data as delaying their capacity to implement the final rule change until late in 2015. ENA notes that the rule change will only require the provision of zone substation data where it is available;
- while Energex believes that the provision of data is already regulated by the AER under approved pricing arrangements for alternative control services, Jemena considers that it would be inefficient to regulate the fee for the provision of zone substation reports. ENA considers that it is appropriate for the AER to consider this matter on a case by case basis in its framework and approach within the regulatory determination process.

If you have any questions on these matters please do not hesitate to contact Lynne Gallagher by phone on 6272 1515 or by email on [lgallagher@ena.asna.u](mailto:lgallagher@ena.asna.u)

Yours sincerely,



John Bradley  
Chief Executive Officer