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Mr John Pierce  
Mr Neville Henderson  
Dr Brian Spalding  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Commissioners,

#### **A: Introduction**

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Energy Australia welcomes the opportunity to comment on the National Generators Forum (NGF) proposal to amend the National Electricity Rules (NER) by requiring Distribution Network Service Providers (DNSPs) to publish historical annual electricity load data for all zone substations within their networks.

We are one of Australia's largest energy companies providing gas and electricity to over 2.7 million household customers many of which are located in Victoria. We own and operate an integrated portfolio of energy generation and storage facilities across Australia. As such, we have an interest in this rule change proposal submitted by the National Generators Forum (NGF).

We support the rule change request submitted by the NGF.

The rule change improves the granularity of published load data to allow market participants to undertake a valid empirical assessment of the factors that are driving electricity demand. In addition to this, access to historical load data at the sub regional level will enable any interested party to undertake their own independent demand forecasts. This will allow them to validate or check and challenge the Australian Energy Market Operator's (AEMO's) electricity demand forecasting.

Finally, we would support the consideration of any subsequent rule changes which relate to the publishing of demand data at either the zone substation or connection point level on a live basis. Neither this rule change proposal<sup>1</sup> nor AEMO's related proposal to publish connection point demand data<sup>2</sup> deal specifically with the publishing of more granular demand data on a live basis.

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<sup>1</sup> AEMC, Consultation Paper, *National electricity amendment (publication of zone substation data) rule 2013*, 26 April 2013

<sup>2</sup> AEMO, *Proposal to publish connection point demand data*, 30 August 2012

## **B: Response to key stakeholder questions**

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### **Does the data need to be published in a standardised format (for example in a spreadsheet) for ease of access? If so, what is the preferred format?**

Electricity load data released by distributors should reflect the standard market formats produced by AEMO.

Metered data currently published by AEMO is produced in a specific format. AEMO has published its market data in a standard market format for a long period. As such, market participants are familiar with the format.

For the sake of consistency, we suggest that any electricity load data released by distributors reflect the market formats produced by AEMO. This will make it easy to compare information on load data produced by AEMO.

### **Are there likely to be issues of confidentiality surrounding the publication of zone sub- station data?**

We are not aware of any major confidentiality issues associated with the provision of historical load data at the sub regional level.

Nevertheless, for the sake of being diligent, when AEMO releases this information to the market, the confidentiality of consumers should be considered.

For this reason, the AEMC needs to decide on the level of disaggregation that it will release this information to the market in. This way it will avoid any problems associated with confidentiality.

### **What is the materiality of the benefits identified by the proponent?**

The NGF has listed a range of material benefits that this rule change will deliver.

The materiality of the benefits associated with this proposal will be difficult to quantify in the short term.

Nevertheless, the longer term benefits of the efficient decision making that this proposal will deliver will be immense when compared to the upfront costs of its implementation.

Therefore, on balance, we support it.

### **Should there be a consistency of approach in publishing zone substation and connection point electricity demand data?**

There should be a consistency of approach in publishing zone sub-station and connection point electricity demand data.

This will allow market participants to compare the demand data that it receives from both of these areas. Market participants will have the opportunity to reconcile the data from both sources. The additional transparency should help facilitate the development of efficient markets.

### **C: Conclusion**

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EnergyAustralia appreciates the opportunity to make a submission on this issue. For further inquiries regarding this submission, please feel free to contact Mr. Con Noutso Regulatory Manager at EnergyAustralia on Tel: 03 8628-1240.

Regards

Yours sincerely

Signed for email

**Con Noutso**  
Regulatory Manager