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The Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

By Email: Submissions@AEMC.gov.au

Dear Dr Tamblyn

National Electricity Amendment (Confidentiality Arrangements in Respect of Information Required for Power System Studies) Rule 2008

Eureka Funds Management Group

Eureka Funds Management Group (Eureka) is a boutique, independent business formed to manage investments for a small number of institutional investors, predominantly Australian Superannuation Funds.

Eureka is actively assessing the feasibility of an investment in a power generation project and requires power system studies to be completed to analyse the optimal connection option for the project.

Eureka is not currently a Registered Participant but intends to apply at the appropriate stage of this project. We are advised that NEMMCO is prohibited by the current Rules from releasing information required to perform power system studies to us or our preferred power system consultants. We are therefore contracting with a TNSP to perform these studies, and it is sub-contracting the work to our preferred power system consultants. This introduces additional costs and delays to our project.

Rule change proposal

Eureka is supportive of the Rule Proposal by the National Generators Forum, as modified by this submission. Under their proposal the ability to perform power system studies would remain restricted to existing Registered Participants.

Eureka's proposal

Eureka proposes that the parties eligible to obtain data necessary to perform power system studies should be widened to include Intending Participants.

Benefits of Eureka's proposal

Benefits which are likely to arise from accepting this proposal include;

- Electricity services will be provided more efficiently by more efficient power system analysis by investors at an earlier stage of their project,

- Investment in electricity services will be promoted by removing this potential barrier to entry, and
- Investment in electricity services will be promoted by a faster investment process.

How the Eureka proposal meets the Market Objective

The above benefits are highly aligned with meeting the Market Objective. Preventing or delaying efficient power system analysis by Intending Participants does not meet the Market Objective.

Relevance to Rule change proposal

As the Eureka proposal requires only minor amendment to the Rule change proposal to provide additional benefits, it is highly relevant to this Rule change proposal, and would be most efficiently implemented at the same time.

Other submissions

Eureka is supportive of the submission by Digsilent as supplemented by this submission.

This submission is not confidential.

Yours sincerely



Eureka Funds Management