

Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
PO Box H166  
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Dear Dr Tamblyn

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**TransGrid Submission on Rule change proposal and the proposed National Electricity Amendment (EnergyAustralia Participant Derogation (Metering Installations)) Rule 2006**

TransGrid would like to thank you for the opportunity to comment on this important consultation. This brief non-confidential submission points out a number of concerns that TransGrid would like to draw to the AEMC's attention. These include:

1. While the EnergyAustralia (EA) derogation request outlines the interface between EA transmission and EA distribution networks, there are still some remaining interfaces between TransGrid's transmission system and EA distribution networks.
2. Section 5.3 of the submission contains a typographical error. The asset transfers took place in 1989 and not 1999.
3. Attachment B, lists a number of TransGrid substations, these being
  - Beaconsfield West,
  - Haymarket,
  - Sydney East,
  - Sydney North,
  - Sydney South and
  - Vales Point.

Any derogation should recognise that this is the current case, and should in its final form have appropriate definitions that take this situation into account.

4. Most importantly, for those metering installations covered by the proposed derogation, it is requested that for the period of the derogation, that EA must be regarded as the 'responsible person' under the National Electricity Rules.

I trust these comments are of assistance to you. Should you wish to discuss any of these matters further, please feel free to contact me on (02) 9284-3434 or via email: [phil.gall@transgrid.com.au](mailto:phil.gall@transgrid.com.au), or John Prot on (02) 9284 3055 or via email: [john.prot@transgrid.com.au](mailto:john.prot@transgrid.com.au)

Yours sincerely

  
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