

25 October 2013

Mr John Pierce
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Attention : Trevor Johnston

National Electricity Amendment (Publication of zone substation data) Rule 2013 (ERC0156)

Dear ~~Mr Pierce~~ *John,*

As the peak national body representing gas distribution and electricity transmission and distribution businesses throughout Australia, the Energy Networks Association (ENA) has welcomed the opportunity to constructively engage on the proposal to publish historical electricity zone substation data (the Rule change).

As ENA stated in its submission to the Australian Energy Market Commission (AEMC) on the Rule change, as a general principle we support the public release of information where it can be demonstrated that it is useful to the market and could improve efficiency and transparency. We further supported the AEMC's proposed assessment framework on the understanding that it would include an assessment of the net benefits of the Rule change.

In subsequent discussions with the AEMC and the NGF, broad agreement has been reached on a number of the caveats raised in the ENA's submission. The details of the ENA position on the issues raised in our submission are provided in the attachment. In essence, agreement has been reached on the nature and availability of half-hourly load data that could be required to be released annually under the Rule change.

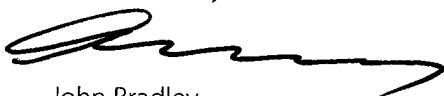
ENA does not support the NGF request for the provision of single line diagrams in addition to the half hourly load data. This information is currently confidential, as there are potential security risks and it has not been demonstrated that the information currently provided within the Distribution Annual Planning Reports (DAPR) is not sufficient.

In relation to customers whose connection agreements impose confidentiality obligations on networks, there would be additional costs in seeking permission for the release of this data and/or in aggregating the data to protect confidentiality. We note that confidential or commercially sensitive information is excluded from the DAPRs.

The AEMC's resolution of all of these issues under consideration will address the potential to impose unwarranted costs which are ultimately paid for by electricity consumers. While at this stage, it remains unclear to the ENA whether the benefits asserted in the Rule change proposal can be demonstrated, the ENA supports information transparency without imposing additional costs or risks to energy users.

Should you have any further question or matters where we can be of assistance please do not hesitate to contact Lynne Gallagher on 62 72 1515 or by email lgallagher@ena.asn.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Bradley', written over a horizontal line.

John Bradley
Chief Executive Officer

Attachment

This Attachment addresses the three elements of the Rule change which would require distribution networks to:

1. make half hourly load data available for all zone substations;
2. provide data on an annual basis and where available for each of the previous ten years; and
3. publish this data on their website.

In addition, it addresses the additional issues of the provision of single line diagrams requested by the NGF and the consequences of confidentiality obligations imposed on networks under connection agreements.

1. Availability of half hourly load data

Source, form and limitations of half hourly load data

In discussions with the AEMC and the NGF it has been agreed that distribution networks could annually publish historical electricity load data at the zone substation level. This data would be sourced from the Supervisory Control and Data Acquisition (SCADA) systems, and published in raw form.

Different distribution networks collect different types of data. It has been agreed that each distribution network can clearly label the data with the date and time of the meter reading, the time interval and the unit of measurement including power factors (MW, kV,MVA).

ENA considers that it is important that the Rule change recognises the limitations of the publicly available data. While the data is fit for network purposes, it may not be sufficiently accurate or complete for other unrelated purposes by various users. The data should be available to users on an "as provided basis" and users should accept the use of the data at their own risk without recourse. Should there be any requirement for distribution networks to assist potential users regarding interpretation of the data, this could be ultimately costly to electricity consumers without any corresponding direct benefit.

Meaning of zone substation

The proposed Rule change as currently worded would apply to zone substations within an electricity distribution network, according to the AEMC's consultation paper. ENA understands that the Rule change applies to outgoing distribution feeder metering and not incoming transmission metering. Note that not all zone substations are metered.

The ENA would like to draw the AEMC's attention to the fact that the term "zone substation" proposed to be included in the National Electricity Rules as a result of the Rule change may have different meanings to different distribution networks. Whilst the term refers to a substation which transforms sub-transmission voltage to distribution voltage, there may be other substations, which are not called "zone substations" which also supply distribution feeders (i.e. transform sub-transmission to distribution voltage). The ENA understands such substations would not be covered by the proposed Rule change.

2. Annual release of data

ENA supports the AEMC's proposed process that could be followed for the annual release of the data by distribution networks. Rather than the Rule change requiring distribution networks to publish half-hourly load data on their websites, distribution networks could undertake the following steps:

1. Distribution networks would provide information on their website on how an interested party could make a request for zone substation load data.
2. Upon receiving such a request, the distribution network would make the data available to the person making the request in a reasonable time.
3. The data to be made available includes:
 - a. once only provision of 10 year historical data load data (extending as far back as 10 years, where available); and
 - b. ongoing annual data provision — load data for the previous year only, which is updated annually as part of the DAPR process.

3. Publication of data

The AEMC proposes that distribution networks would provide the data offline in a medium of their choice (e.g. CD, USB Drive). ENA suggests that distribution networks have the option to provide data in plain text form via a data storage device or for users to download data via a secure website download.

4. Additional issues

Single line diagrams of zone substations

The DAPRs provide regional line diagrams and plans showing network configuration. The ENA does not support the public release of spatial information on the location of substations (e.g. GIS) and single line diagrams for zone substations, as requested by the NGF. Where this information is currently made available it is subject to confidentiality agreements. Widespread public release, as proposed by the NGF, raises potential security concerns.

ENA considers that there is sufficient detail in the maps published in the DAPR to provide connectivity of the zone substation to its supplying substation. ENA disagrees that the information in the DAPR is too high level to enable the development of algorithms to interpret load step changes between one zone substation and another.

Confidentiality

Customer confidentiality obligations are imposed on distribution networks under connection contracts.

In the context of the Rule change, the issue of confidentiality arises where the zone substation serves a single customer or where a single customer accounts for a substantial proportion of the load although there may be many customers in total. The incidence of single customer zone substations varies from network to network. In South Australia for example, single customer zone substations are between 5 and 10 per cent of all zone substations.

The ENA has considered both the options of aggregating data from these dedicated zone substations with neighbouring substations, and of excluding this data from public release, where the distribution network considers this would be in breach of their obligations.

Aggregation will not always avoid confidentiality issues, as it may not be possible given the configuration of the network to conceal certain customer loads. As the manipulation of the data adds to costs, and aggregation could run counter to the objective of analysis of locational loads it is preferable that the Rule change allow distribution networks to exclude confidential or commercially sensitive data from public release. ENA notes that confidential or commercially sensitive information is excluded from the DAPRs.