

24 May 2013

John Pierce  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

**AER submission on AEMC consultation paper – Publication of zone substation data rule (ERC0156)**

The Australian Energy Regulator (**AER**) welcomes the opportunity to comment on the National Generators Forum's (**NGF**) rule change request which seeks to impose a new requirement on distribution businesses to annually publish historical electricity load data at the zone substation level.

As a general principle, we support the public release of market information and believe that it can promote the National Electricity Objective. Greater transparency around the operation of the market generally provides market participants with more reliable information on which to base their decisions, thereby promoting more efficient outcomes.

The NGF's rule change request outlines a number of benefits of publishing actual electricity demand data at the zone substation level namely:

- the publication of historical zone substation data would enable better modelling of the key determinants of electricity demand changes at the sub-regional level, which could lead to more efficient decision making, and
- the publication of this historical data would better enable industry and other interested parties to independently check and challenge AEMO's electricity demand forecasting performance.

We believe that if the data is robust, these types of benefits are likely to occur from the proposed rule change. We also note that, given the recent changes in demand and increased attention on demand issues, these benefits might be particularly relevant in the current market environment.

Clearly these benefits need to be weighed up against the potential issues associated with implementing the rule change – namely the costs of collecting, updating and publishing data

and the potential to publish confidential material. While the AER is not well placed to comment on the data costs, we note Energex's submission that it can extract half-hourly zone substation interval load data from SCADA. As such, the data costs would not appear to be significant. We also note that issues around confidentiality should be able to be managed through limited aggregation of zone substation data to protect the identity of individual customers.

If you would like to discuss any aspect of this submission please contact Gavin Fox on (02) 6243 1249.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michelle Groves', with a long horizontal flourish extending to the right.

Michelle Groves  
Chief Executive Officer