

25 July 2012



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

Dear Mr Pierce

DRAFT RULE DETERMINATION: National Electricity Amendment (Distribution Network Planning and Expansion Framework) Rule 2012 (ERC0131)

Thank you for the opportunity to comment on the AEMC's draft rule determination for the National Electricity Amendment (Distribution Network Planning and Expansion Framework). Endeavour Energy has the following comments to make in response to this determination.

Endeavour Energy is generally supportive of the changes that have been made to the original rule proposal and believe that the majority of concerns raised by us in previous submissions on this matter have been addressed in the draft Rule. It is noted that the Electricity Networks Association (ENA) has discussed a number of issues relating to this draft determination with the AEMC. Endeavour Energy is supportive of the ENA's position on these issues.

One outstanding concern that Endeavour Energy would like the AEMC to consider relates to the Distribution Annual Planning Report date. In our submission on the consultation paper on the proposed rule, Endeavour Energy submitted that each jurisdiction should be allowed to determine the start date for the annual planning period based on variations in seasonal loading across DNSPs. The draft Rule has recognised this by allowing a start date based on current jurisdictional requirements. New South Wales however does not have a jurisdictionally mandated annual planning date and the draft Rule therefore mandates a 31 December date by which Distribution Annual Planning Reports must be published.

Endeavour Energy's network predominantly experiences its peak loading during summer and we have traditionally aligned our planning processes to ensure that we have a forward plan in place prior to the start of summer each year. This includes publication of our Annual Planning Statement, as required by the NSW Code of Practice for Demand Management, by the end of June. This enables us to not only understand and have in place plans to address constraints that our network may experience over summer, but also aligns with the end of the financial year and regulatory determination periods, which facilitates budgeting and reduces the administrative burden.

Endeavour Energy submits that, where there is not a jurisdictional requirement for a planning date, then a default date of 30 June should be specified in the Rule.

If you have any questions regarding this submission, please do not hesitate to contact our Regulatory Technical Manager, Rick Wallace, on (02) 9853 6648.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Rod Howard", with a large, sweeping flourish at the end.

Rod Howard
Interim Chief Operating Officer