

5 June 2013

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



positive energy

Dear Mr Pierce

**Consultation Paper: National Electricity Amendment (Publication of Zone Substation Data) Rule 2013 (ERC0156)**

Energex Limited (Energex) refers to the Australian Energy Regulator's (AER's) late submission to the publication of zone substation data rule change proposal and, in particular, the following reference to the Energex submission:

"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."

Energex considers it important to clarify these comments as they appear to have been taken out of context.

The Energex submission states that the *extraction* of raw SCADA data is relatively straightforward and that Energex does not consider that the costs involved in performing this task would be material. However, as detailed in Energex's submission, if the DNSP is required to perform other activities, including data cleansing, verification and reconciliation, then the DNSP may incur material costs which would be passed on to network customers.

For these reasons, when considered in its entirety Energex's submission questions whether the benefits of the proposed rule change would sufficiently outweigh the potential costs imposed on distributors. If there are material benefits from the rule change, it is important that the beneficiaries bear any incremental costs driven by the rule change.

Should you have any enquiries regarding this report please contact Louise Dwyer, Group Manager Regulatory Affairs, on (07) 3664 4047.

Yours sincerely

Kevin Kehl  
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