18 August 2005

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
Sydney NSW 2001
By email: aemc@aemc.gov.au

Dear Dr Tamblyn

EnergyAustralia submission to the AEMC
Scoping paper: Review of transmission revenue and pricing rules

Thank you for the opportunity to comment on the scope of the Australian Energy Market Commission's review of the electricity transmission and pricing rules.

The AEMC review represents a critical opportunity to improve the scope and form of economic regulation for transmission services. The scoping paper presents a comprehensive range of the complex issues that need to be considered as part of the review.

In the attached submission, we have raised a number of areas for consideration by the AEMC including questions over the range of tasks assigned to the Australian Energy Regulator (AER) that were not specifically covered in the scoping paper. Throughout the MCE consultation process on the new national electricity market arrangements, EnergyAustralia as maintained concerns about the tasks assigned to the AER in the rules. These issues require consideration by the AEMC to ensure that the AER does not overstep the roles envisaged under the national electricity law.

At a broader level, EnergyAustralia is concerned about the potential for divergence between transmission and distribution regulatory policies and procedures. While the AEMC is considering procedures for transmission regulation, the MCE is considering the same issues for distribution as part of the review of the national framework for the regulation of gas and electricity distribution and retail. We hope that the AEMC and MCE will endeavour to ensure consistency in the regulatory approaches for transmission and distribution.
EnergyAustralia looks forward to continued involvement in this review and hopes this submission will provide assistance to the AEMC. Any enquiries can be directed to Ms Nives Matosin on (02) 9269 4257 or email nmatosin@energy.com.au.

Yours sincerely

Geoff Lilliss
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