

4 June 2015

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



positive energy

Dear Mr Pierce

Consultation Paper: National Electricity Amendment (AEMO access to demand forecasting information) Rule 2015

Energex Limited (Energex) appreciates the opportunity to provide a submission on the Australian Energy Market Commission's (AEMC's) consultation paper on National Electricity Amendment (AEMO access to demand forecasting information) Rule 2015.

Energex generally supports the fundamental purpose of the proposed rule change which is to improve the Australian Energy Market Operator's (AEMO's) ability to accurately forecast electricity demand. Energex understands that accurate demand forecasts are important to the efficient operation of the National Electricity Market (NEM), including efficient investment in, and operation and use of, electricity services.

However, it is also important that any rule change placing an obligation on Distribution Network Service Providers (DNSPs) to provide assistance that AEMO reasonably requests in connection with its National Transmission Planner function should:

- be based on a demonstrable need and that the benefits to AEMO and energy market stakeholders should outweigh the regulatory and administrative burden that will be imposed on DNSPs;
- take into consideration DNSPs may not currently aggregate demand forecasting data to a connection point level as network investment at this level is not the responsibility of the DNSP;
- limit the data request to key drivers of peak demand;
- not include data that can identify individual customers; and
- clearly define the additional information required by AEMO to enable automated systems to be established to provide the data at the lowest cost.

Finally, the Energy Networks Association (ENA) will be making a submission on behalf of its members. As a member of the ENA, Energex supports the ENA's submission.

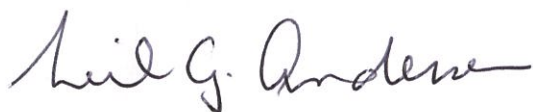
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Should you have any queries regarding this submission, please contact Rachel Leaver,
Network Regulation Manager, on (07) 3664 4115.

Yours sincerely

A handwritten signature in black ink that reads "Neil G. Andersen". The signature is written in a cursive style with a long horizontal flourish at the end.

Neil Andersen
Group Manager Regulation and Pricing