

10 March 2011

Australian Energy Regulator  
Level 35, The Tower  
360 Elizabeth Street  
Melbourne Central  
Melbourne VIC 3000

Dear Sir,

In respect of the exempt network at Amcor Gawler SA, and pursuant to AER Communication No. 349 – 2011-12 Distribution Loss Factor Approval Process; Energy Response wishes to request that the AER extend the validity of Amcor Gawler's 2010-11 DLF value to financial year 2011-12.

Amcor's glass bottle factory in Gawler, SA has 3 identical production lines which operate 24/7. The third and newest production line was commissioned in April 2010, and it became fully operational 2 months later. This means we have less than 1 year's worth of load profile whereby all 3 production lines are in operation; hence we can't verify that Amcor Gawler's 2011-12 DLF will be different from that of 2010-11.

In our approved DLF submission for financial year 2010-11, we've taken into account all 3 production lines - we estimated the load profile of the third stage by using an average of the first 2 stages. This is a reasonable assumption because all 3 production lines have similar electrical layouts and their operational characteristics remain the same year-in year-out.

Furthermore, there are only 3 child meters on Amcor Gawler's exempt network, one each on the 3 embedded generators at the plant. For the whole of financial year 2009-10, total generation at the plant is only 56MWh; whereas for financial year 2010-11, total generation to date is only 17MWh. Considering the small amount of generation at the plant, we expect changes to the DLF, if any, to have an immaterial financial impact.

If you require any additional information please contact me on 03 8643 5912, 0432 488618, or [tihaur.tan@energyresponse.com](mailto:tihaur.tan@energyresponse.com).

Yours faithfully,



TiHaur Tan  
Electrical Engineer

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