



17 May 2018

Mr Peter Adams
General Manager, Wholesale Markets
Australian Energy Regulator
GPO Box 520
MELBOURNE VIC 3001

Dear Peter

Re: TRANSMISSION ANNUAL PLANNING REPORT GUIDELINE CONSULTATION PAPER

CitiPower, Powercor and United Energy welcome the opportunity to respond to Australian Energy Regulator's (AER) consultation paper on the Transmission Annual Planning Report (TAPR) Guideline.

We support the Energy Networks Australia's (ENA) submission to the consultation paper. As per ENA's submission, most of the additional information proposed to be provided in the TAPR is onerous while its benefit to consumers is unclear. To maximise the long-term benefits to consumers it is crucial that information provided in the TAPR is:

- useful to non-network service providers and other network users/stakeholders. For example, while 'primary plant age' is one of many inputs used in network planning, it is not perceptible or useful to non-network providers or other network users as standalone information.
- cost-effective. For example, providing the conductor type, rating and year for each section of line is extremely onerous and would require resources disproportionate to the benefit of providing such information, particularly as it is unclear how the information would be used.

The ENA submission highlights what information we consider to be cost-effective and useful to non-network service providers and other stakeholders, aligning the reporting requirements more closely to AER's existing Systems Limitations Template.

Victorian arrangements

Victorian distributors jointly prepare the Transmission Connections Planning Report (TCPR) which feeds into Australian Energy Market Operator's (AEMO) Victorian Annual Planning Report (VAPR). If the TAPR guideline applies in Victoria, there should be consideration for Victorian arrangements and any additional processes/templates that may be required.

Should you have any queries about our letter please do not hesitate to contact Sonja Lekovic on (03) 9683 4784 or slekovic@powercor.com.au.

Yours sincerely,

Brent Cleeve
Head of Regulation, CitiPower, Powercor and United Energy