

8 August 2011

Mr Chris Pattas
General Manager
Network Regulation South Branch
Australian Energy Regulator
PO Box 520
Melbourne VIC 3001

Dear Chris,

AER's Consultation Paper – Issues and AER's preliminary positions
Connection charge guidelines: for accessing the electricity distribution network

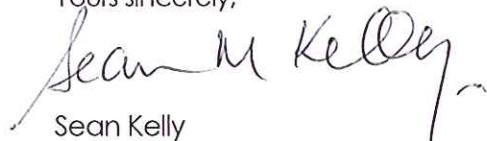
ETSA Utilities submission is attached. In summary ETSA Utilities generally supports many of the AER's preliminary positions with regard to the connection charge guidelines. There are several matters where ETSA Utilities considers the guidelines could be improved including:

- consistency of definitions across regulatory frameworks;
- additional design criteria covering simplicity for customers and taking account of jurisdictional arrangements;
- ensuring the level of cross subsidy from existing to new customers is not significantly increased;
- tender arrangements are flexible and not overly prescriptive;
- maintaining thresholds consistent with current SA arrangements; and
- simpler arrangements for refunds

The improvements are considered appropriate as they reflect changes to SA arrangements to address customer expectations or address specific SA jurisdictional circumstances which are working well.

We would welcome the opportunity to further discuss our submission. Should you have any questions please contact Mr Grant Cox on (08) 8404 5012.

Yours sincerely,



Sean Kelly
General Manager Corporate Services
ETSA Utilities

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