



**UNITED ENERGY
Distribution**

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Mr Tom Leuner
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Approach to reporting requirements and monitoring standards in the electricity market

Dear Tom

United Energy Distribution (UED) welcomes the opportunity to provide comments on the AER's Draft Report on the the Approach to reporting requirements and monitoring standards in the electricity market and the Revised Guideline. The comments provided below are based on the Revised Guideline.

In section 1.3, Form of request, it is inappropriate for one Registered Participant to advise on the costs, and the basis for the costs, of the additional or more onerous requirements on the relevant party. The relevant party is best placed to consider the additional requirements and cost impacts based on their systems and processes. The applicant should be defining the value of the benefits that they would realise if the additional requirements were imposed.

The third bullet point in section 1.3 should be amended to reflect that the applicant needs to provide the value of the benefits to them and the basis for those benefits, including how this translates to customer benefits.

The Form of a request suggests that an applicant seeks to impose additional requirements on a relevant party. Section 1.4 states that the AER will consult with the relevant Registered Participants and Section 1.5 states that the AER, may consider whether the additional requirement is best imposed on all or particular categories of Registered Participants.

In making its decision to impose additional requirements, the AER must have regard to whether the information sought by the additional requirement cannot reasonably be obtained by more cost effective means. UED consider that the National Electricity Objective prevails, any imposition of additional reporting requirements needs to be in the long term interests of customers. The AER must have regard to whether there is a net benefit for customers. It is not appropriate to just consider the most cost effective means of obtaining the information without considering whether there is an overall net benefit to customers. UED recommend changing the third bullet point in section 1.5 to reflect that the AER must take into account the net benefit to customers.

If you have any questions on the above, please do not hesitate to phone me (03) 8540 7819.

Yours sincerely

Verity Watson

Manager Regulatory Strategy