



UNITED ENERGY
Distribution

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Mr Tom Leuner
General Manager
AER – Markets Branch
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Approach to additional reporting requirements for NEM participants and AEMO

Dear Tom

United Energy Distribution (UED) welcomes the opportunity to provide comments on the AER consultation regarding the Approach to additional reporting requirements for National Electricity Market (NEM) participants and AEMO and the Draft Guideline on the imposition of additional or more onerous requirements, procedures or standards under clause 8.7.2(g) of the National Electricity Rules (NER).

In section 1.4 of the proposed Guideline the AER refers to consulting with affected Registered Participants and footnotes clause 8.7.2(d). Clause 8.7.2(d) is dealing with requirements over and above the normal requirements but which do apply to an extent generally. Under clause 8.7.2 (d) the AER is required to consult with the relevant Registered Participants.

Clause 8.7.2(d) deals with a different subject matter from clause 8.7.2(g). Clause 8.7.2(g) deals specifically with additional requirements on a Registered Participant at the request of another Registered Participant or AEMO. Thus section 1.4 of the proposed Guideline, particularly as it is footnoted, does not provide comfort that consultation will occur with a Registered Participant which might be the subject of an additional obligation under clause 8.7.2(g).

There will have been an opportunity to make submissions about why the additional obligation should not be imposed, but not necessarily consultation on practical matters like a reasonable time period in which to develop and provide reports. To that end UED submits that consideration be given to including in the AER's guidelines the "safeguards" that were included in NECA's guideline;

- Restrict the information to that which is reasonably necessary to monitor compliance;
- Specify the particular information and a reasonable time period of reporting required; and;
- Consultation with the relevant Registered Participant to determine a reasonable time in which to provide the information.

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