



5th of September 2014

Sebastian Roberts
General Manager
Australian Energy Regulator

Dear Mr Roberts,

2014 Jemena Gas Access Arrangement Review

Upon receiving the marked up version of the RSA, EnergyAustralia welcomes the opportunity to make a further supplementary submission to the Australian Energy Regulator (**AER**) on the 2014 Jemena Gas Access Arrangement Review (**Access Arrangement**).

EnergyAustralia is one of Australia's largest energy companies, providing gas and electricity to over 2.7 million household and business customers in NSW, Victoria, Queensland, South Australia and the Australian Capital Territory. EnergyAustralia owns and operates a multi-billion dollar portfolio of energy generation and storage facilities across Australia, including coal, gas and wind assets with control of over 5,600 MW of generation in the National Electricity Market.

In addition to our submission sent on the 25th of August 2014, we would like to further inform the AER that the AEMO NSW/ACT B2B Process and Regulatory group are working towards achieving harmonisation on a large scope of transactions and Regulatory provisions.

As part of this effort, the agreed timings and service level agreements are currently being worked through with a general view that Jemena will have best endeavours to align with Victorian timings as much as possible.

We envision that where there are no current provisions in the Retail Market Procedures, the Jemena Network Code or the existing Access Arrangement that places obligations on to Jemena to complete a service within a specified time, that this is captured and documented appropriately for transparency to market participants.

We would also like to add that use of the term "best endeavours" will not be an acceptable replacement for documenting a specified timeframe. The use of this term does not provide clarity for system build and will also not provide an acceptable customer experience to our end consumer. To this end, we would therefore not support use of this term in any proposals regarding timing deliveries.

Specific commentary surrounding the marked up version of the RSA is provided in the table located in appendix A. If you require any further information regarding this submission, please contact Hillary Sutton Industry Development Manager, Gas on 03)8628 1387 or IndustryDev@energyaustralia.com.au

Regards,

A handwritten signature in black ink, appearing to read 'Hillary Sutton', with a stylized flourish extending to the right.

Hillary Sutton

Industry Development Manager, Gas



Appendix A

Item	2015 AA reference	Summary of proposed change	EnergyAustralia's feedback and proposed amendments
15.7	Basic Metering Equipment Downgrade at existing Delivery Station	(b) The User is not entitled to require the Service Provider to downgrade Basic Metering Equipment.	EnergyAustralia supports the removal of this previous clause which restricted users ability to request a downgrade to Basic Metering equipment.
15.9	Disconnection, Decommissioning and Meter Removal	(b) The User must: (i) prior to making a request under clause 15.9(a) above, have complied with all obligations placed on the User under relevant Laws relating to arranging for the disconnection of the premises served by a Delivery Point or the decommission a Delivery Point (as applicable); (ii) (i) provide the Service Provider with sufficient information to enable the Service Provider to determine the appropriate method of disconnection or decommissioning, including the reasons for disconnection.	EnergyAustralia seeks confirmation of the modification of this clause. Is the intention of this addition to impose different timing deliveries for a customer requested service vs a Retailer requested service? (i.e 3 days vs 5 days). We would not support different timeframes based on the requestor.
15.11	Repair Maintenance of Basic Metering Equipment	Where the Service Provider is responsible for maintenance of the Basic Metering Equipment and provided that the User provides the Service Provider and its authorised contractors with access (or procures that the Service Provider and its authorised contractors are provided with access) at reasonable times to the Delivery Station	EnergyAustralia would like to see timeframes specified in order to set the right customer expectation on when a faulty meter will be repaired. We note that the issue surrounding SLA and Timing requirements will be key drivers as part of the NSW/ACT B2B project and hope to have these issues addressed through a

		<p>and procures the co-operation of the User's Customer, the Service Provider must or must cause its authorised contractors to carry out necessary repairs of the Basic Metering Equipment within a reasonable time of becoming aware of the need to do so. :</p> <p style="padding-left: 40px;">(a) becoming aware of the need to do so; and</p> <p>and</p> <p>(b) securing access to the Delivery Station.</p>	<p>negotiated collaborative effort with industry participants.</p>
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