



**EnergyAustralia**

LIGHT THE WAY

15 October 2018

Mr Sebastian Roberts  
General Manager, Transmission and Gas  
Australian Energy Regulator  
GPO Box 520  
MELBOURNE VIC 3001

Lodged electronically: [AERInquiry@aer.gov.au](mailto:AERInquiry@aer.gov.au)

Dear Mr Roberts,

### **AER Draft transmission annual planning report guidelines**

EnergyAustralia is one of Australia's largest energy companies with over 2.6 million electricity and gas accounts in NSW, Victoria, Queensland, South Australia, and the Australian Capital Territory. We also own and operate a multi-billion dollar energy generation portfolio across Australia, including coal, gas, and wind assets with control of over 4,500MW of generation in the National Electricity Market (NEM).

We welcome the opportunity to comment on the AER's Draft transmission annual planning report (TAPR) guidelines (the draft guidelines). We are supportive of having the draft guidelines detail the information requirements that Transmission Network Service Providers (TNSPs) must publish when completing their TAPRs. As the AER correctly identifies this will ensure that there is consistency across TNSPs as to what is included in their TAPRs as well as ensuring that there is sufficient information available to participants to make informed decisions in the market. The benefits of additional information included in TAPRs should be considered against the potential additional costs to consumers for the TNSPs to provide this information.

### **Transmission connection point historic load trace**

While we are supportive of additional information being provided to the market we are concerned about the confidential nature of some consumer loads and the impact that these proposed changes may have on this. There likely exists value in historic load traces being made available, but only in circumstances where publishing this information does not allow any confidential information to be inferred. We suggest that the AER (or the AER should require the TNSPs to) consider each transmission connection point and the associated major loads connected to determine if there is information of a confidential nature that may be revealed. An example of this may be a connection point in which a singular major load at any one time can be a substantial portion of the power being consumed.

### **Conclusion**

We support the draft guidelines intent to standardise the information required to be published by TNSPs in their TAPRs provided consideration is given to the potential confidential nature of some participants loads. Additional cost to consumers also needs to be weighed up against the benefits changes to the TAPR guidelines provide.

EnergyAustralia Pty Ltd  
ABN 99 086 014 968

Level 33  
385 Bourke Street  
Melbourne Victoria 3000

Phone +61 3 8628 1000  
Facsimile +61 3 8628 1050

[enq@energyaustralia.com.au](mailto:enq@energyaustralia.com.au)  
[energyaustralia.com.au](http://energyaustralia.com.au)

If you would like to discuss this submission, please contact me on 03 8628 1630 or by email [andrew.godfrey@energyaustralia.com.au](mailto:andrew.godfrey@energyaustralia.com.au).

Regards

**Andrew Godfrey**

Industry Regulation Lead