



Ref. BW

28 January 2011

Warwick Anderson
General Manager
Network Regulation North Branch
Australian Energy Regulator
GPO Box 3131
Canberra ACT 2601

61 Mary Street
Brisbane QLD 4000
PO Box 15107
City East QLD 4002
Phone 07 3228 8222
Fax 07 3228 8118
Website www.ergon.com.au

Email: AERInquiry@aer.gov.au

Dear Mr Anderson,

Submission on AER Objectives and Priorities of Electricity Network Service Provider Performance Reports – Discussion Paper

We refer to the Australian Energy Regulator's (AER) discussion paper on the Objectives and Priorities of Electricity Network Service Provider Performance Reports.

Ergon Energy Corporation Limited welcomes the opportunity to provide a submission to this consultation and has provided a response to the objectives and priorities set out in the AER's discussion paper.

Please do not hesitate to contact me on (07) 3228 2741 if you have any further queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brad Waters', with a long horizontal stroke extending to the right.

Brad Waters
Acting Group Manager Regulatory Affairs

Telephone: (07) 3228 2741
Email: brad.waters@ergon.com.au

Encl: Ergon Energy's submission

Ergon Energy Corporation Limited

**Discussion Paper: Objectives and priorities of
electricity network service provider
performance reports**

**Australian Energy Regulator
28 January 2011**

Discussion Paper: Objectives and priorities of electricity network service provider performance reports

Australian Energy Regulator

28 January 2011

This submission, which is available for publication, is made by:

Ergon Energy Corporation Limited
PO Box 15107
City East
BRISBANE QLD 4002

Enquiries or further communications should be directed to:

Brad Waters
Acting Group Manager Regulatory Affairs
Ergon Energy Corporation Limited
Email: brad.waters@ergon.com.au
Ph: (07) 3228 2741
Mobile: 0439 770 264
Fax: (07) 3228 8108



1 INTRODUCTION

Ergon Energy Corporation Limited (EECL) welcomes the opportunity to provide comment to the Australian Energy Regulator (AER) on its *Discussion Paper: Objectives and priorities of electricity network service provider performance reports* (Discussion Paper).

This submission is provided by EECL in its capacity as a Distribution Network Service Provider (DNSP) in Queensland. In this submission, EECL is referred to as 'Ergon Energy'.

Ergon Energy is available to discuss this submission or provide further detail regarding the issues raised, should the AER require.

2 SPECIFIC COMMENTS

Ergon Energy currently reports a range of measures to jurisdictional and national regulators, including the AER, the Office of the Renewable Energy Regulator, the Queensland Competition Authority and the Queensland Department of Employment, Economic Development and Innovation. Some measures are reported to both national and jurisdictional regulators, giving rise to an additional administrative and compliance burden and the risk of data misinterpretation.

Whilst Ergon Energy is generally supportive of the priorities and objectives of performance reporting as set out in the Discussion Paper, Ergon Energy considers that performance reporting objectives should include the need to have regard for minimising, and wherever possible, eliminating duplication of reporting requirements.