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23 December 2010

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RE: AER's Position paper on Retail Market Performance Reporting November 2010

CitiPower Pty and Powercor Australia Ltd (**the Businesses**) welcome the opportunity to comment on the Australian Energy Regulator's (**AER**) Position Paper on "*Retail Market Performance Reporting November 2010*" (**the Position paper**), which was developed in response to submissions and further discussion on possible approaches to the AER's new retail performance functions.

The Businesses have reviewed the Position paper and support the AER's recognition of the importance of minimising duplication of reporting requirements imposed by other regulators and the AER. The Businesses submit that annual and/or six-monthly reporting is sufficient for the purposes of transparency and accountability, and to align with current reporting requirements. More frequent reporting will lead to increased costs in collating, reviewing, checking and issuing the reports. The Businesses also submit that to ensure accuracy of reported information the submission date should be set no less than 2 months after the period of data required

Should you have any further questions in relation this response, please do not hesitate to contact Rolf Herrmann on (03) 9683 4282 or at rherrmann@powercor.com.au.

Yours sincerely

Rolf Herrmann
MANAGER REGULATION