



Trans Tasman Energy Group

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**Mr Warwick Anderson
General Manager, Network Regulation
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601**

Re: Preliminary positions— Framework and approach for SA Power Networks

This submission is in response to the AER's "Preliminary positions paper, Framework and approach for SA Power Networks, Regulatory control period commencing 1 July 2015", of December 2013. (the Paper).

Public Lighting Classification

Trans Tasman Energy Group support the AER's continued classification of public lighting services as a Negotiated Distribution Service for the reasons outlined by the AER in its Paper.

Further reasons for the retention of this classification for the service were outlined in our previous submission to the AER's "Notice inviting submissions: Queensland and SA electricity distribution businesses — Framework and approach" of June 2013.

Public Lighting Type 7 Metering

To enhance the AER's description of the services provided by SAPN in providing type 7 metering we advise the AER that Type 7 metering procedures undertaken by SAPN must comply with both Part A and B of AEMO's "Metrology Procedure: National Electricity Market".

We would welcome the opportunity to discuss any points we have raised in our submission, and in providing any further assistance to the AER in the preparation of its Framework and Approach (F & A) for the next regulatory control period commencing 1 July 2015.

Yours sincerely,

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Principal Consultant**

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