



30 January 2014

Mr John Pierce  
Chairman  
Australian Energy Market Commission  
Level 5, 201 Elizabeth Street  
Sydney NSW 2000

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### **Draft Rule Determination – National Electricity Amendment (Publication of zone substation data) Rule 2013**

Dear Mr Pierce,

Jemena Electricity Networks (Vic) (**Jemena**) welcomes the opportunity to respond to the Australian Energy Market Commission (**AEMC**) draft rule determination on the publication of zone substation data.

Jemena supports the publication of information on how a distribution network business would make zone substation data available to a person as proposed in the draft rule determination.

Specifically, the AEMC has asked stakeholders to comment on the commencement of the final rule and whether it would be desirable for the Australian Energy Regulator (**AER**) to regulate the price of the service prior to the start of the next regulatory control period for a distribution network service provider (**DNSP**).

#### **Commencement date**

Jemena considers the commencement date of the final rule change should be aligned with the DNSPs publication date of the next distribution annual planning report (**DAPR**). It would allow adequate time for Jemena to put in processes and systems to provide the zone substation information within the 30 business days.

#### **Regulation of fee for the provision of zone substation data**

The draft rule determination makes provision for distribution network businesses to charge a fee for the provision of zone substation data and “any fee specified must be no more than that required to meet the reasonable costs anticipated to be incurred by the DNSP in providing the relevant zone substation reports”.

The fees are for the provision of:

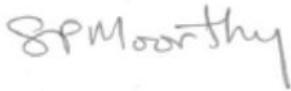
- i. a ten year zone substation report; and/or
- ii. one or more annual zone substation reports.

Jemena believes it is not useful for these fees to be regulated because the fees recover the reasonable costs of providing zone substation reports and the costs would vary depending on whether the request is for one or more reports or a ten year report.

We understand that it may be necessary to regulate a distribution service that is commonly and frequently requested by electricity customers, but this not the case here. The AER may also consider it is inefficient to regulate the fee for the provision of zone substation reports.

If you have any questions in relation to this submission, please contact me on (03) 8544 9442 or by email [siva.moorthy@jemena.com.au](mailto:siva.moorthy@jemena.com.au).

Yours sincerely

A handwritten signature in grey ink that reads "Siva Moorthy". The signature is written in a cursive style with a large initial 'S'.

**Siva Moorthy**  
Manager Network Regulation and Strategy