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30 October 2009

Dr John Tamblyn Chairman Australian Energy Market Commission PO Box H166 AUSTRALIA SQUARE NSW 1215

By email: submissions@AEMC.gov.au

Dear Dr Tamblyn

Response to AEMC Total Factor Productivity Design Discussion Paper

Thank you for the opportunity to comment on the Australian Energy Market Commission's (AEMC's) Design Discussion Paper – Review into the use of Total Factor Productivity for determination of prices and revenues.

ActewAGL Distribution's response to the *Design Discussion Paper* is provided in the attached submission. ActewAGL Distribution is keen to participate in ongoing consultation on the possible use of a total factor productivity methodology.

Please contact Leanne Holmes, Manager Network Regulation (0412 850715) if you would like to discuss any aspect of our submission.

Yours sincerely

David Graham

Director Regulatory Affairs and Pricing