

8 November 2000

FILE No

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Mr Paul Bilyk
Acting General Manager
Regulatory Affairs - Electricity
Australian Competition and Consumer Commission
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Our Ref: R-00-214A

Dear Mr Bilyk,

**NATIONAL ELECTRICITY CODE CHANGES – FULL RETAIL COMPETITION
INTERIM AUTHORISATION (A90739, A90740 AND A90741)**

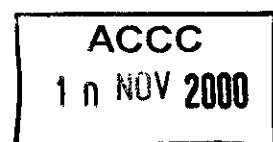
We refer to interim authorisation on the "Minimalist Code Changes" for Full Retail Contestability granted by the Australian Competition and Consumer Commission ("the ACCC") on 27 October 2000 and amending the earlier authorisation granted on 21 September 2000.

Ergon Energy supports the changes made to the first interim authorisation that:

- remove the sunset for load profiling; and
- include more definite terms of reference for the review of the metrology procedures.

We are concerned however by the requirement that the Jurisdictional Regulator review of the Metrology Procedures within six months of becoming the Metrology Coordinator. Given the considerable resources that Market Customers will invest to comply with the Metrology Procedures, the possibility that the Procedures will be changed within such a short period of time from their introduction creates uncertainty and poses a significant regulatory risk for Market Customers. If it is considered necessary to review the Procedures, then the review could be undertaken at the implementation stage.

We believe the Final Authorisation should ensure that the Metrology Procedures are reviewed and approved (in respect of their compliance with the Code requirements) by the Jurisdictional Regulator as part of the implementation process. Consequently the requirement on the Jurisdictional Regulator to review the Procedures six months after becoming the Metrology Coordinator should be removed.



We would be happy to discuss our thoughts with you at your convenience. Please feel free to call Robert Speed on (07) 3228 8149 or myself on (07) 3228 8116 if you have any queries.

Yours faithfully,



Darren Barlow
Manager Regulation
Strategic Business Development Group