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Review of the Minimalist transitioning approach for ERGON Energy

AGL welcomes the opportunity to provide comment on the review being undertaken by the Queensland Competition Authority on the minimalist transitioning approach currently in place for ERGON Energy.

In Summary, AGL supports the continuation of the Minimalist transition approach. AGL submits the following responses to the questions raised by the Authority.

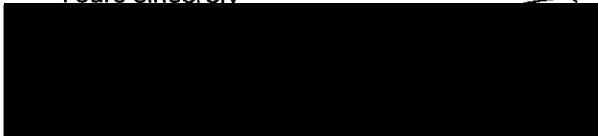
- AGL has no current concerns regarding ERGON's response time to process NMI discovery or NMI creation requests and has not experienced measurable delays in response to requests for transactions that are included as part of the current minimalist approach.
- AGL would support the current review period of 12 months being retained unless ERGON Energy indicates to the Authority that NMI information requests and/or NMI creation requests are exceeding a predetermined volume.

AGL also submits the following:

- There has been no evidence provided that indicates that further investment in an automated system for ERGON transfers and NMI creation would enable the Queensland Electricity market to operate in a more efficient and effective manner. ;
- AGL suggests that if other participants recommended the implementation of an automated system that an industry wide Cost Benefit analysis be undertaken to establish if this will deliver an overall benefit to the market and customers.

Please contact Andrew Robertson, Regulatory Development Manager on 03 8633 6045 should you wish to discuss this matter further.

Yours sincerely



Andrew Robertson
Regulatory Development Manager