

Our Ref: D12/45572
Your Ref:



22 October 2012

Mr Ray Chan
Assistant Director
Office of the Tasmanian Regulator
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Dear Ray,

Revised Regulatory Reporting Guideline

Transend welcomes the opportunity to respond to matters raised in the Regulator's consultation paper on the revised Regulatory Reporting Guideline, Tasmanian Gas Retail Code and Tasmanian Gas Distribution Code Consultation Paper. Transend's comments are limited to the revised Regulatory Reporting Guideline.

Transend supports the Regulator's amendments to the Regulatory Reporting Guideline to enable alignment across the energy supply industry. However as identified in the Consultation Paper, frequent reviews are an administrative burden and impose inefficient costs on the business. This is particularly the case if the reporting duplicates or does not align with the reporting timelines required by national regulatory bodies. For example, Transend submits independent appraisals of its asset management and vegetation management plans to the Australian Energy Regulator as part of the supporting documentation to its revenue proposal. Transend considers triennial reporting inefficient in this circumstance.

Transend supports the retention of flexibility in relation to the frequency of reporting in clause 2.4 of the Regulatory Reporting Guideline. As acknowledged by the Regulator, too frequent reporting, even on a triennial basis, may result in significant costs with little to no regulatory benefit. Transend therefore welcomes the opportunity to discuss an efficient reporting program with the Regulator.

Should you require any further information on this matter, please do not hesitate to contact me on 62743915 or by email at kirstan.wilding@transend.com.au.

Yours sincerely,

Kirstan Wilding
NEM Strategy and Compliance Manager

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