

A few
words.



12 October 2009

Manager
Energy Technical and Safety Regulation
- Draft Harmonisation Enhancement Plan
MCEMarketReform@ret.gov.au

Dear Sir/Madam,

AGL strongly support the position of the National Generator Forum in its response to you regarding the Draft Energy Technical and Safety Harmonisation Enhancement Plan. A copy of this response has been attached for reference.

AGL would like to reiterate a number of points made in the NGF response that have relevance to AGL.

- AGL does not support the inclusion of electricity generation and gas plants in this Plan, which has clearly been developed and is considered only appropriate for;
 - Electricity networks (transmission and distribution)
 - Gas networks (pipelines and distribution).
- AGL expresses disappointment that the State Energy Regulators have expressed their intent to not align the different legislative requirements that currently apply to electricity generation and gas plants. AGL is of the view that as the Terms of Reference include harmonisation of regulations in the generation sector there is a clear obligation on the State Energy Regulators to take action in this area.
- AGL submits that harmonisation of regulations in the energy sector pertaining to generators and gas plant should not be abandoned at this point, but that this issue should remain on the agenda of the Leaders Group (or subsequent body) as an outstanding item, to be reconsidered when the Model National OHS Regulations are enacted.

If you would require any further clarification of AGL's position on this topic please do not hesitate to contact me on 03 8633 6026.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alex Cruickshank'.

Alex Cruickshank
Head of Energy regulation