



19 November 2013

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Dear Neville

Draft TDL liability allocation determination 2012/13

Thank you for the opportunity to submit on the Commission's draft 2012/13 TDL draft determination. We support the approach set out in the draft determination and recommend the Commission finalise the draft.

By applying the TDL on a consistent basis from year to year the Commission assists the industry to achieve regulatory certainty and predictability. The Commission's approach in the draft determination is consistent with the 2011/12 determination and instructions provided. From a process perspective, this also reduces compliance costs and complexity for liable parties. We therefore support the Commission finalising the draft in the current form.

We do not intend to make further comments on the 2013 methodology in this submission; these issues were considered exhaustively through the 2011/12 process. However, if other parties seek to re-open settled positions and the Commission is considering changes to the draft approach, we would like the opportunity to submit further.

Yours sincerely

John Wesley-Smith
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