

9th November 2009

Mr Gary Henry
Director, Electricity & Gas
Queensland Competition Authority
GPO Box 2257
Brisbane QLD 4001

Dear Mr Henry,

Interim Consultation Notice

Benchmark Retail Cost Index for Electricity: 2010-11

Integral Energy (Integral) welcomes the opportunity to provide comment in relation to the Queensland Competition Authority's (QCA's) Interim consultation Notice for the Benchmark Retail Cost Index (BRCI) for Electricity: 2010-11 which was released in October 2009.

As previously agreed during the current QCA review on the Queensland Pricing and Tariff Structures, there are significant issues with the current methodology used to determine notified electricity prices within Queensland. For a number of reason outlined in stage 1 & 2 of this review, the continued application of the current BRCI approach will continue to see notified electricity pricing being set below supply costs.

As such, Integral strongly recommends that any change to the notified prices for the 2010-11 period brings prices to a more cost reflective state.

However, in the absence of any pricing and tariff structural changes being passed in Queensland, Integral would support the same approach of calculating the BRCI for 2010-11 that was previously adopted in 2009-10.

Should you require further information or wish to discuss this matter, please contact James Shaw, State Operations Manager Queensland on (07) 3852 8303.

Yours sincerely,



Bruce Rowley
General Manager Retail

Queensland, the power is in your hands