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Australian Energy Market Commission

ERC0257 Transparency of new project submission

NODE Energy Services (NODE) is pleased to make a submission on the ERC0257 Transparency of new projects draft rule determination. NODE is a technical consultancy, who's core team have a heritage of success connecting wind and solar projects across the NEM in previous roles within the industry.

In this submission NODE provides input to the 3 key aspects of the draft rule change.

1. Reforms for the intending participant category

NODE agrees with the balance struck by the AEMC in enabling project developers to be deemed *Registered Participants* for the purposes of clauses 3.13.3(k) and the consequential provisions of 3.13.3 that allow project developers access to the information required while being bound by the confidentiality obligations under 8.6 of the NER.

We agree with the commission's view that other rights and obligations that currently apply to Intending Participants such as under clause 5.16.5 and 5.17.5 should not apply to project developers as this is in line with the principles of balancing the benefits of increased transparency against the regulatory and administrative costs that would ensue.

NODE therefore supports the Commissions' more preferable draft rule as it serves to meet the objective of transparency and fairness which in-turn supports efficiency.

2. Information provision to market participants

NODE agrees that the generation information page is an extremely valuable resource in industry. Technical consultancies rely heavily on the page while undertaking power system studies on behalf of developers. The page provides information on the status of new projects allowing consultants to ensure the correct projects are considered while undertaking studies that support development of generator performance standards.

- **NER obligation on AEMO to maintain the generator information page**

We agree that codifying the AEMO generation information page will ensure that AEMO continues to publish the page in the future. We also strongly support the draft rule requirement for connection applicants to promptly provide updates to ensure the page remains current.

- **Frequency of publication**

NODE appreciates the need to have a balance between the frequency of publication and the administrative burden of updating the page. In a time where the large volume of renewable connections is straining resources within the industry, we note that a regular publication would also help to mitigate delays in the development of generator performance standards which

requires accurate power system modelling. Power system studies undertaken by technical consultancies can take up to 12 weeks to complete and where project information is readily available in the course of the studies this would ensure up to date analysis by the completion date of the studies.

NODE therefore opines that a quarterly publication could continue to add to delays in the connection process for new projects. We note that in recent months AEMO have consolidated the page into a single NEM data file and published the page at more regular intervals¹ with instances of an updates within weeks apart i.e. 18 July 2019, 29 July 2019, 08 August 2019.

Notwithstanding the new channels of information flow proposed in the draft determination, the above suggests that a more frequent publication can be achievable. NODE suggests that the explicit requirement under the New Rule 3.7F(c)(1) for AEMO to publish the information separately for each region may not allow AEMO the flexibility in setting out a process that allows the fastest route to publication. This has been evident in the more frequent publication period achieved since AEMO consolidated the page.

- **Information provision requirements for DNSPs**

The draft determination considers that the information provision requirements imposed on TNSPs should not extend to DNSPs. We note that there are increased number of projects greater than 30MW that are seeking to connect at the distribution level and in certain cases because of the nature of the network, power system studies that are undertaken in the GPS development for transmission projects need to consider modelling projects at the distribution level.

It would therefore be appropriate for information on these distribution projects to be available in the Generation information page to support accurate modelling.

3. Implementation

NODE supports the proposed implementation timeframes but expresses concern for the availability of the existing generation information page in the interim until the required publication date of 27 February 2020. NODE considers that it would be crucial to ensure AEMO continue to publish the page in its current format or otherwise until the proposed effective date.

NODE welcomes the opportunity to discuss any aspects of this submission by email to Elizabeth.Maina@nodeaustralia.com

Yours sincerely,



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¹ <https://www.aemo.com.au/Electricity/National-Electricity-Market-NEM/Planning-and-forecasting/Generation-information>