

REF: ERC0062

6 February 2009

Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

Via e-mail: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Dr Tamblyn,

**Submission on Specific Issue (REF ERC0062) - Confidentiality Arrangements in Respect of Information Required for Power System Studies**

Suzlon Energy Australia (SEA) appreciates the opportunity to comment on the specific issue in relation to the proposed transitional arrangement for the aforementioned Rule change proposal. SEA's submission is concerned with the time frame stipulated in Clause 11.25(b) and a minor edition to the proposed clause 3.13.3(l)(1).

With respect to clause 11.25(b), the AEMC has suggested a time frame of three months for a Generator to provide the *releasable user guide* to NEMMCO. SEA offers full turnkey Wind Power Plant solutions for our clients, and if required SEA would be expected to prepare a suitable *releasable user guide* for the Suzlon constructed wind power plant projects. The wind power plants consist of auxiliary equipment provided by other suppliers and it would take considerable time to negotiate and obtain the relevant information for the *releasable user guide*. To aid preparation of the *releasable user guide* for multiple projects in a realistic timeframe we ask you to consider providing nine months (ie. till 29 November 2009) in clause 11.25(b).

With regards to the proposed clause 3.13.3(l)(1) we suggest you include the following, "or clause 11.25(b)" after "S5.2.4(b)(8)", ie.

"3.13.3(l)

(1) If NEMMCO holds and is required under this paragraph (l) to provide a *releasable user guide* that NEMMCO received under clause S5.2.4(b)(8) **or clause 11.25(b)**, NEMMCO must provide the *releasable user guide* to the *Registered Participant* in an unaltered form."

In order for a Generator to provide the *releasable user guide* under clause S5.2.4(b)(8), one of the four triggers in clause S5.2.4(b)(1)-(4) has to be satisfied. Hence with the inclusion of "or clause 11.25(b)" there is an alternative avenue for providing the *releasable user guide* through the transitional phase.

Should you wish to discuss any aspect of our comments please contact the undersigned.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ragu Balanathan', is centered on the page. The signature is fluid and cursive, with a small mark at the end.

**Ragu Balanathan**

Manager, Development and Strategy

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