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Christiaan Zuur
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
By website: www.aemc.gov.au

Dear Mr Zuur

**RE: ERC0112 National Electricity Amendment (Release of Generator information by AEMO)
Rule 2010 Consultation Paper**

The Clean Energy Council (CEC) is the peak body representing Australia's clean energy and energy efficiency industries. Its priorities are to create the optimal conditions in Australia to stimulate investment in the development and deployment of world's best clean energy technologies; develop effective legislation and regulation to reduce energy demand and improve its efficient use; and work to reduce costs and remove all other barriers to accessing clean energy.

The CEC advocates the development of policies on behalf of its members at federal and state government levels and promotes understanding of the industry and its potential through channels such as industry events, forums, conferences, newsletters and publications. The clean energy industry includes generation of electricity using bioenergy, geothermal, hydropower, ocean, solar and wind energy as well as the emerging technologies and service providers in the energy efficiency sector, which includes solar hot water and cogeneration.

The CEC welcomes the opportunity to make a submission in response to the AEMC's Consultation Paper on the Release of generator information by AEMO, proposed by the Senergy Econnect Australia.

All grid connections have a level of uncertainty given the prospect of being affected by other generating projects connecting into the grid close to or in parallel to their connection.

Access to generation project data prior to 3 months and to commissioning is considered reasonable. When the project is at commissioning phase, it is well under construction and other projects located nearby are likely to be aware of the generator for some time, especially if it is a large generator.

However, there are situations when companies may have progressed to a signed connection agreement only to find that the project economics have been affected by external forces. In these situations projects are delayed and design elements may be changed. Thus, such changes would warrant data released early, from projects not under construction, as preliminary.

Until the performance standards are agreed upon and the modelling is complete, a connecting party is only able to provide draft information to AEMO. This draft information may change depending on whether there are any last minute adjustments to the plant's performance standards prior to executing a Connection Agreement. Final detailed performance data will only be finalised following the validation of the models.

It is important to note that the earlier the data release is, the less reliable that data is likely to be, and participants will need to use it carefully.

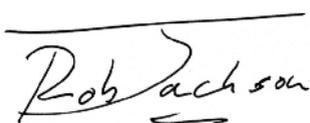
Additionally, the project proponents have different incentives around the timing of the release of data depending on their status. Publicly listed companies may have different drivers to privately owned companies.

The CEC and its member companies appreciate the value to the market of making information available as soon as practicable. Generally the release of information is to aid project progression and not hinder it.

We consider timely access to information a priority while still providing connecting parties the required flexibility to finalise their releasable user guide. This is to ensure performance standards are set and the technical modelling is completed.

To discuss our submission and answer any other questions, please contact the undersigned on (03) 9929 4100 or via email nicolen@cleanenergycouncil.org.au.

Yours sincerely



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Deputy Director



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