



Level 1, The Realm
18 National Cct
Barton ACT 2600
ABN: 83 113 331 623

Tel: 02 6198 3490
Fax: 02 6198 3333
www.ngf.com.au

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Australian Energy Markets Commission
AEMC Submissions
PO Box A2449
SYDNEY SOUTH NSW 1235

By electronic submission: www.aemc.gov.au

Dear Dr Tamblyn,

Draft Rule: Transparency of Operating Data: ERC0096

The National Generators Forum (NGF) welcomes the opportunity to make a submission in relation to the Draft Rule Determination dated 18 February 2010.

The Rule change proposal which is dealt with in this Draft Rule Determination follows a request by the NGF to NEMMCO for earlier publication of certain data to increase spot market data transparency.

The NGF is pleased that the proposals in this draft determination would lead to outcomes consistent with our intentions in making that request.

We had hoped that this outcome could be achieved without the need for a Rule change, but we recognise that this Rule change, if made, will lead to a clearer and more secure outcome.

The NGF also supports making changes to the spot market timetable in the transitional provisions of the Rule change, thus enabling increased transparency to be achieved without the need for a separate consultation by AEMO on these timetable changes.

We note that the AEMC has determined that the relevant data should be made available to the public, not solely to market participants. We do not oppose this. We assume that the outworking of this would be that the data is provided through the AEMO website. This should not preclude the information also being available through the Market Management System, as this system would generally be more convenient for market participants who already receive related information in this way.

If you have any questions in relation to this submission please contact Ken Secomb on 03 9617 8321.

Yours sincerely



Malcolm Roberts
Executive Director