

19 December 2014

Commissioner Neville Henderson  
Chairman, Reliability Panel  
Australian Energy Market Commission

By online submission: [www.aemc.gov.au](http://www.aemc.gov.au)

Dear Mr Henderson

**RE: Generator Compliance Template review**

GDF SUEZ Australian Energy (GDFSAE) appreciates the opportunity to comment on the Reliability Panel review into the appropriateness and usefulness of the Template for Generator Compliance Programs (Template).

The Template aims to provide clarity to stakeholders on what constitutes good industry practice with respect to performance standard compliance. In striving to achieve this outcome, the Template must balance the conflicting goals of providing sufficient detail to be useful, and not forcing different technologies into a “one size fits all” approach.

The Template as updated in 2012 has proved to be a useful resource for GDFSAE in developing and updating our generator compliance programs. GDFSAE is mindful that the Template document includes a set of ten principles, along with explanatory notes and definitions which provide context for the application of the table included in the Template document.

GDFSAE supports the approach adopted by the Reliability Panel in outlining the principles and explanatory notes which recognise that the Template itself is intended as a guide to assist generators in preparation of their compliance programs, and it is not intended to be a prescriptive description. The importance of this is demonstrated by recognising that generator compliance programs will need to vary to take account of a range of factors, including:

- New technology (eg new digital AVR's settings are not subject to drift and therefore require less frequent testing);
- Mothballed plant (plant that is shut down for lengthy periods may not be expected to start-up solely for compliance purposes); and
- Older generators with performance standards established through old versions of the Rules.

In reference to the last point The Template (version 27 June 2012) in section 2.3<sup>1</sup> (Pre-existing compliance) notes that some older generators were connected in accordance with older versions of the Rules. GDFSAE understands this to mean that for certain older generators their performance obligations are in some cases established by reference to previous versions of the Rules, however the last sentence of section 2.3 does not make clear what compliance obligation should apply in such cases. GDFSAE suggests that section 2.3 be re-

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<sup>1</sup> Note that some of the contents page section headings are inconsistent with the body of the text.

**GDF SUEZ Australian Energy**

Level 33, Rialto South Tower, 525 Collins Street  
Melbourne, Victoria 3000, Australia  
Tel. +61 3 9617 8400 Fax +61 3 9617 8301

[www.gdfsuezau.com](http://www.gdfsuezau.com)

INTERNATIONAL POWER (AUSTRALIA) PTY LTD  
ABN 59 092 560 793

worded to make it clear that the compliance obligation for some generators will be established through older versions of the Rules.

GDFSAE hopes that the comments within this submission are helpful to the Panel, and would be happy to discuss further if necessary. Please do not hesitate to contact me on, telephone, 03 9617 8331.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Chris Deague". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

**Chris Deague**  
Senior Market Specialist