

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
AUSTRALIA SQUARE NSW 1215

Dear Dr Tamblyn

**PROPOSED RULE NO. 2005/1 - TIMELY INFORMATION TO NEMMCO AFTER
OPERATING INCIDENTS**

With respect to the proposed rule change received by NECA on 19th April 2005,
Macquarie Generation welcomes the opportunity to comment.

The National Generators Forum (NGF) has prepared a submission for your
consideration and Macquarie Generation supports the NGF position.

Macquarie Generation agrees that all available and relevant information regarding a
system incident should be submitted to NEMMCO within 20 business days to assist in
their investigation. Macquarie Generation also agrees with the NGF's concern that the
proposed rule change acknowledge that there may be some information that cannot be
supplied within the proposed timeframe.

You will be aware that Macquarie Generation was involved in the system incident on
13th August 2004 in which three Bayswater units tripped following a severe earth
fault in TransGrid's Bayswater switchyard. Macquarie Generation generally
responded quickly to NEMMCO's requests for information as it became available and
this included attending a briefing meeting after the incident to update NEMMCO on
latest progress with the investigation.

NEMMCO's formal request for information regarding the 13th August 2004 trips
included an "*assessment as to whether the protection response was appropriate*".
While Macquarie Generation provided NEMMCO with all available information at
the time, it would not have been possible to provide this assessment within the 20
business day timeframe proposed in the rule change. As it turned out, the ultimate
cause of the Bayswater unit trips could not be identified until several months after the
incident. The investigation involved detailed analysis by experts in the field and
Macquarie Generation kept NEMMCO informed of progress during this period. A
final report was submitted to NEMMCO and all NEM generators in May 2005.

Macquarie Generation believes that the proposed Clause 4.8.15(d1) should
acknowledge that there might be some information that cannot be provided within 20
business days. The clause should include a two-staged process, as proposed by the

NGF. Firstly, the generator should provide all available information to NEMMCO within 20 business days. Secondly, if there is any information that cannot reasonably be provided within that timeframe due to uncertainties or the need for further investigation, then the generator should inform NEMMCO of this fact and provide details of how the information will be obtained and when.

Please contact Jim Beckwith on 02 4968 7478 (direct) or 0402 092 468 (mobile) if you have any questions.

Yours faithfully



22/9/05

RUSSELL SKELTON
MANAGER MARKETING AND TRADING