

16 February 2009

The Reliability Panel
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Email: panel@aemc.gov.au



Dear Mr Woodward

Technical Standards Review - Draft Report

ENERGEX Limited (ENERGEX) welcomes the opportunity to comment on the Australian Energy Market Commission Reliability Panel's Technical Standards Review – Draft report. This submission is prepared by ENEREX in its capacity as an electricity distribution network service provider (DNSP) in Queensland.

ENERGEX notes that one of the main objectives of this review was to improve the clarity of the technical standards, in addition to their appropriateness. ENEREX generally supports the Principles outlined in the Issues Paper. However, based on the objective of the review, ENEREX believes that the issue of voltage fluctuations and the Queensland specific derogation (previously raised in ENEREX's response to the Issues Paper), should be taken into consideration in the drafting of the Final Report or alternatively as part of the subsequent review in which the detailed content of the technical standards will be revised.

S5.1.5 Voltage Fluctuations / Clause 9.37.12 Voltage Fluctuations Derogation

In Queensland, clause S5.1.5 of Schedule 5.1 of the *National Electricity Rules* (Rules) is replaced by the derogation set out in clause 9.37.12 of the Rules, which relates to voltage fluctuations.

ENERGEX requests that the derogation be removed. This will allow the current Australian Standard AS/NZS 61000.3.7 to be reflected in the technical standards that apply in Queensland and will result in Network Service Providers (NSPs) in Queensland being consistent with utilities in other states, whilst also allowing potential benefits to be delivered to customers which operate in multiple states.

In particular, ENEREX believes that the Australian Standard referred to in the derogation is too restricting and should be removed because Figure 1 only applies to step voltage changes and is not suitable for assessing other



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forms of periodic voltage fluctuations including ramps, double steps, triangular and rectangular shapes.

The Australian Standard AS2279 does not specify voltage flicker limits for customers and fails to provide detailed assessment when voltage disturbances come from multiple sources. ENERGEX believes that the AS/NZS 61000.3.7 is the appropriate Standard it should be using because it specifies planning levels and network users/customer allocation levels for voltage fluctuations limits. This specification provides a clear assessment process for disturbances coming from multiple sources.

Lastly, the derogation only replaces S5.1.5 of Schedule 5.1 and not S5.1a of the Rules. This has created a problem for ENERGEX because all registered participants are required to comply with S5.1a of the Rules and NSPs, are further required to enforce the Australian Standard AS/NZS 61000.3.7. Therefore, the Australian Standard referred to in the derogation is inconsistent with the current applicable Australian Standard referred to in S.5.1a. ENERGEX believes that deleting the derogation in clause 9.37.12 will remove this inconsistency and improve clarity.

ENERGEX acknowledges that whilst the Panel is not considering such detail at this stage of the Review, it requests that these comments are taken into account in developing the Final Report or the subsequent review in which the detailed content of the technical standards will be revised. In particular, ENERGEX argues that the changes being proposed above are non-controversial and wishes to avoid any delays in making such improvements to the Rules.

Yours sincerely



Chris Arnold
General Manager Network Performance