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File:

The Chairman  
Australian Energy Market Commission  
Level 5, 201 Elizabeth Street  
SYDNEY NSW 2000

Dear Dr Tamblyn

**CONFIDENTIALITY ARRANGEMENTS IN RESPECT OF INFORMATION  
REQUIRED FOR POWER SYSTEM STUDIES**

Thank you for the opportunity to submit this response to the First Round Consultation regarding a proposed Rule change in relation to "confidentiality arrangements in respect of information required for power system studies".

WorleyParsons is one of the largest global engineering consultancies with in excess of 25,000 personnel distributed across most continents. In Australia we have been closely involved with the power industry for many years, with large power engineering offices in Sydney, Melbourne and Perth. Our clients include power utilities, government regulatory and planning bodies, and private sector enterprises including power generators and mining and industrial operations. For many years we have provided comprehensive power system studies services to clients in all of these sectors.

Limitations of access to generator and generator transformer data that we have experienced on many occasions since changes were introduced in March 2007 with Version 13 of the National Electricity Rules have made it difficult for us to provide the services that our clients regularly and legitimately request of us. We therefore welcome the proposed changes to the Rules insofar as they aim to allow the data to be more accessible. However, as an interested party that is neither a TNSP nor NEMMCO, the major difficulties that we have faced will remain unchanged under these proposed changes to the Rules.

The Rule Proposal is concerned with the effect of the confidentiality of information provisions in the existing Rules. We believe that it should provide for NEMMCO to disclose sufficient information to not only Registered Participants but also to Intending Participants and the engineering consultants (or agents) formally engaged by Registered Participants and Intending Participants. We believe this provision is necessary in order that the "confidentiality of information" issue does not impact negatively on the "long term interests of consumers" as outlined in the National Electricity Market Objective (refer National Electricity Law, section 7). With respect to the Rule Proposal we are prepared to receive the Releasable User Guide under formal conditions of confidentiality in order to protect the commercial interests of the supplier of the generating system.



A provision of the Rule Proposal is that the Releasable User Guide would be provided to certain parties on the basis of written consent of the person who provided the Releasable User Guide. Our expectation is that this provision would, in effect, nullify the intent of the Rule Proposal for the reason that such consent may not always be granted. In some cases pertaining to older existing plant it may not be possible to locate the original source of the information.

The Rule Proposal provides for the Releasable User Guide to provide the information that is itemised in subparagraph S5.2.4 (b) (5) of the Rules. We consider that this list of information must be augmented with the complete voltage ratio and impedance information pertaining to any related generator transformers, as our experience has been that such information is also interpreted to fall within the definition of confidential information. Without access to relevant generator transformer information it is not possible to perform the accurate power system studies that are a necessary requirement in the planning and negotiation of generator and load connections.

For reasons of gauging broader effects, many power system studies require the release of dynamic information pertaining to generators and generator transformers that are in parts of the network remote to the immediate section of the network being modelled. To ensure that the objectives of the Rule Proposal are met, it is also important that the release of information relating to such remote assets of the system is allowed under the provisions of any changes to the Rules.

Regarding the provision of the Rule Proposal that requires the release of some data in encrypted format, we consider that this does not serve the best long term interests of consumers. Such a provision effectively locks the power system planning environment into one version of one software package which will progressively become obsolete. This also prevents engineering checks to be carried out on the encrypted data. We believe a better approach would be to allow the industry to decide the best engineering tools to use.

I trust that these comments will assist you to make a determination that enhances the efficiency of the NEM for all interested parties and consumers.

Yours sincerely  
WorleyParsons

Steve HARRIS  
Regional Director Power