

1 August 2017

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Australian Energy Market Commission
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Submitted online to: <http://www.aemc.gov.au/Rule-Changes/Non-scheduled-generation-in-central-dispatch>

**Non-scheduled Generation and Load in Central Dispatch
Reference: ERC0203**

EDL supports the AEMC's decision not to make the proposed rule.

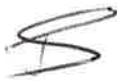
EDL is a national and global supplier of safe, clean, low greenhouse gas emissions energy, remote energy solutions and renewables, with a range of facilities in Australia, including our global headquarters in Brisbane. EDL has 759 MW of installed power generation capacity in Australia, 961 MW globally.

EDL's generation is in the main in the 5MW to 30 MW range and its NEM connected generation is mostly from a range of intermittent fuel sources such as landfill gas, waste coal mine gas and wind. Many of EDL's generators produce electricity from the by-product of an industrial or commercial process.

EDL is of the view that the proposed rule change would place considerable costs and obligations on a generator like EDL and that those would not necessarily translate to benefits to the market such as improved forecasting and demand management.

EDL agrees that implementing a broad mechanism affecting all generating units of a particular size is not the appropriate answer.

Yours sincerely



Tim Sprey
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