

Our Ref: D06/1220

6 January 2006

Dr John Tamblyn
Chairman
Australian Energy Market Commission
By email: submissions@aemc.gov.au

Dear Dr Tamblyn

Re: Draft Rule determination - Review of operating incidents

Transend Networks Pty Ltd (Transend) welcomes the opportunity to comment on the above draft Rule determination, with the draft determination proposing Rule changes to:

1. require registered participants to provide relevant information to NEMMCO within a specified timeframe to support NEMMCO's obligations to investigate and report on power system operational incidents; and
2. expand the current definition of what is considered an operating incident for the purposes of clause 4.8.15 and give the Reliability Panel a role in determining the kinds of incidents that should be investigated.

Transend has no objection to the introduction of the proposed timeframe for providing information to NEMMCO following an incident, as outlined in the draft Rule. Transend also supports introduction of a clearer definition of those incidents to be reported by NEMMCO, as outlined in the draft Rule.

Timeliness of NEMMCO's incident reports

Transend notes that there is presently no timeframe requirements (or even benchmark timeframes) for NEMMCO to complete and publish its incident reports. More timely reports on operating incidents may be facilitated if the Rules provided for such timing requirements. Inclusion of timing requirements for publishing incident reports would further strengthen the Rule change benefits outlined by the Commission on page 13 of its draft Rule determination.

One way to impose such requirements on NEMMCO, and also allow appropriate consultation on this issue, would be to modify the draft Rule to require the Reliability Panel's guidelines to cover both:

1. the incidents to be reviewed by NEMMCO, as presently included in draft Rule clause 8.8.1(a)(9); and
2. standard timeframes (including reasonable grounds for departure from these timeframes) for NEMMCO's publication of incident reports, as an amendment to the draft Rule clause 8.8.1(a)(9).

Please let me know if you have any questions about this suggestion. I may be contacted on 03 6274 3909 or email bess.clark@transend.com.au.

Yours sincerely

[by email]

Bess Clark
Manager Business Planning, Regulation and Compliance