

6 June 2008

Chairman  
Australian Energy Market Commission  
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Dear Dr. Tamblyn

**Proposed rule change to modify the confidentiality arrangements in respect of information required for power system studies**

We refer to the above rule change proposed by the National Generators Forum. Hill Michael Associates welcome the opportunity to make a submission on this significant rule change.

Hill Michael has developed into one of Australia's leading specialist power system engineering businesses. With a growing team of over 40 engineers, complemented by an intimate understanding of major power system analysis software packages and a niche specialisation in the modelling and investigation of transmission networks,. Our main focus is to provide expert electrical networks advice, specifically;

- Conduct major connection analysis and investigation
- Strategic/Long-term network planning,
- Medium-term revenue application network development planning
- Network modelling,
- Protection philosophy and design
- Power quality analysis



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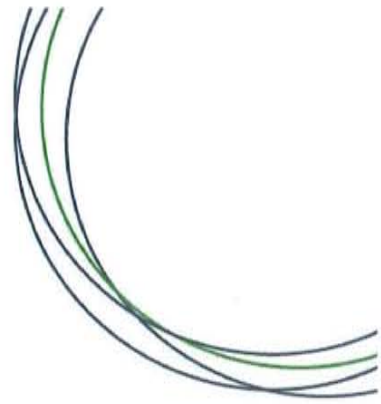
- Wind-farm integration
- Frequency standard review
- Determination of largest generation unit size.

Hill Michael also has a very strong regulatory expertise in assisting NSPs and regulatory bodies manage regulatory, strategy and compliance issues, including conducting Regulatory Tests for network augmentation and investment.

In addition to our consulting services, Hill Michael is Australian and New Zealand agents for the SiemensPTI software suits (including PSS/E, PSS/Sincal, and Models on Demand) and DINIS (E) software. This relationship provides us with unique access to software development and also accreditation to provide training and support to software users.

Hill Michael Associates supports this significant rule change with regards to accessing data to conduct system studies: Power Flow, Short Circuit and Dynamic. The lack of access to dynamic data is impinging our ability to offer services to all generation connection as well as to Transmission network service providers as relevant models and data is not available. . In particular we appreciate the access to executable models, but we believe the scope should extend to include NEMMCO registered block diagrams. The data along with specific models are essential to allow efficient analysis of system issues and we believe in addition to executable models, it is important to have access to block diagram models. We recognise that proprietary designs are confidential and we respect it. However it is essential in conducting analysis that at least mathematically equivalent block diagrams and settings are made available. This will assist in tuning studies and assist in using different software.





We believe access to all block diagrams at least under a confidentiality agreement should be made available to all consultants not just to registered participants. Without such access it is impossible to have consultants conduct studies for clients or to effectively participate and offer services to future generator and load connecting parties.

In summary, Hill Michael Associates:

1. Supports the rule change.
2. Request that block diagrams or at least mathematically equivalent models for conducting power system tuning studies (if the full block diagrams are deemed to be proprietary and to sensitive to disclose) are made available.
3. Make the dataset including all network assets, generators and load models available as part of ANTS/SOO publication to all consultants not just registered participants.

If you have any queries on this submission, Please contact John O'Brien (0418)888652 email: [JGObrien@hmac.com.au](mailto:JGObrien@hmac.com.au) or Dr Chandra Kumble (0417)549 527 email: [ckumble@hmac.com.au](mailto:ckumble@hmac.com.au)

Yours Sincerely



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