

5 February 2009

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Dr John Tamblyn
Chairman
Australian Energy Market Commission
Level 5
201 Elizabeth Street
Sydney NSW 2000

Dear Dr Tamblyn,

Submission in respect of Proposed National Electricity Amendment (Confidentiality Arrangements in Respect of Information Required for Power System Studies) - Specific Issue ERC 0062

Pacific Hydro would like to thank the AEMC for providing the opportunity to comment on the proposed transitional arrangements for the provision of information rule change. Our submission relates to the specific issue of the transitional arrangements relating to data provided to NEMMCO after 15 March 2007.

This rule change concerns information that typically does not belong to the Generator. While the Rules make the Generator responsible for the delivery and accuracy of the information to NEMMCO, the information typically belongs to the supplier of the connected equipment.

Under the proposed Rule 11.25 (b) (ii) information provided after 15 March 2007 could be released if the relevant Generator provided to NEMMCO a written consent for the information to be released. Pacific Hydro could not provide such consent, as the information was provided on a confidential basis and to release it would be contrary to the conditions under which we received the information.

Given that we are not in a position to consent to the release of confidential information provided since 15 March 2007, one of the following will have to happen in order to comply with the proposed Rule:

1. negotiations with the owners of the information (generator and auxiliary equipment) to provide a releasable user guide, or
2. development of a new model in a releasable form.

In our experience, each of these scenarios takes longer than three months. Development of a model for a wind farm from tests to completion of the model has taken in the order of a year in the past, and depending on the complexity of the technology may take longer. There are a very limited number of specialists in Australia that can do this modelling work and access to their time is also difficult. Accordingly, we submit that three months is not a long enough period to fulfil the obligation proposed by Rule 11.25(b)(ii). We suggest that the AEMC considers allowing a period of at least nine months.

We also wish to note that failure to receive consent for the release of the information would not result in the 'safety, and reliability issues for the electricity power system and NEM operations' described in the Explanatory Note for this rule change as NEMMCO currently holds highly detailed confidential information and can use this information to study the power system. The issue is a problem for connecting parties having incomplete dynamic data, which may cause inefficiencies in connections; however this has been the case since 15 March 2007. Trying to rush a solution could result in inaccurate models being supplied, which will not resolve the issues currently faced by connecting parties.

Yours sincerely

This is an electronic letter prepared for publication and consequently bears no signature.

K P Summers
Regulatory Compliance Manager