

Thursday, 20 February 2014

John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
Lodged Electronically

Dear Mr Pierce,

RE: ERC0147 Connecting Embedded Generation Rule Change Draft Final Rule and Position Paper Consultation

The Clean Energy Council (CEC) works with more than 600 solar, wind, hydro, bioenergy, energy storage, energy efficiency, cogeneration, geothermal and marine energy businesses to accelerate the transformation of Australia's energy system into one that is smarter, cleaner and more consumer-focused. Its priorities are to:

- create the optimal conditions in Australia to stimulate investment in the development and deployment of world's best clean energy technologies
- develop effective legislation and regulation to improve energy efficiency
- work to reduce costs and remove all other barriers to accessing clean energy

As previously made clear the CEC welcomes open and frank discussion on the current connection process as it is applied to embedded generators. The CEC's membership is predominately composed of generation developers across the full spectrum of the electricity generation industry with the remaining members being clean energy advocates and the supporting industry. Connection processes are clearly extremely important to the CEC's members.

Overall the policy positions behind the draft rule are laudable and are expected to meet the Commission's objectives for this rule change. In particular the CEC is pleased to see that the draft final rule makes changes to Chapter 5 which are proportionate to the problem at hand, consistent with the vast majority of experienced stakeholders' understanding of Chapter 5 and reflect the fact that, on a policy framework level, no failing of the Chapter 5 connection process has been demonstrated.

The CEC supports the majority of the Commission's policy positions that have now expressed in the draft final rule. As compared to the draft rule the draft final rule is a significant advancement.

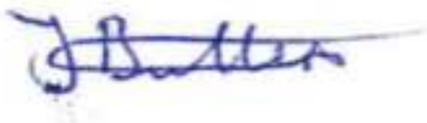
In particular the enhanced information transparency and more defined timelines and obligations will create a connection process which enhances the capacity of connecting generators to fully understand risks. This therefore enhances market objectives by allowing the party which is carrying the risk, and exposed to the full cost to connect, to make fully informed judgements on their investments.

Despite this strong support the CEC believes that some key matters should be given some more consideration in the final rule. These include that:

1. The removal of the stop-the-clock mechanism is followed through;
2. The optional validity period for the detailed response should be removed entirely in order to avoid confusing rules requirements with a hypothetical commercial arrangement which is not used in practice;
3. A requirement should be placed on DNSPs to maintain the validity of data they provide in the detailed response, commensurate with the response fee paid by the applicant, and;
4. Further consideration of the published plant register as there is currently a conflict between the listed information and information held in connection agreements.

In order to avoid ambiguity the attached submission sets out the CEC's responses to each aspect of the Commission's position paper and draft final rule. It then provides comment on particular clauses of the draft final rule as relevant to concerns raised, and includes clarifications of a minor nature.

The CEC is as keen as other stakeholders to see this rule change proceed to an amended National Electricity Rules and would like to thank the Commission for the high level of engagement which has been required to get to this point in the rule change process. Please do not hesitate to make contact on the details below to discuss any part of this submission.

A handwritten signature in blue ink, appearing to read 'J. Butler', with a long horizontal flourish extending to the right.

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1 CEC Responses to the Commission's position paper and draft final rule

The following section sets out the CEC's responses to each aspect of the Commission's position paper¹ and draft final rule. The following section tabulates comments on a clause-by-clause basis to reflect the comments in this section.

1.1 Timing and timeframe extensions

The CEC supports the overall timeframe of four months to be applied to processing the application to connect. Much of the work has already been done at the time an application to connect has been lodged so this obligation simply creates greater certainty for the applicant that the DNSP will provide an offer to connect within a reasonable timeframe. Otherwise, the CEC supports the Commission's position that the *current circumstances*² should remain in place for other aspects of the process (i.e. development of the application and associated studies, etc...).

The CEC supports the extension of time for responses under agreement between the parties with reasons stated in writing and consent provided by the applicant. However, these same obligations should prescribe that a new response date be committed to at this time in order to enhance certainty for the connecting party.

The CEC does not see the need for the inclusion of a stop-the-clock mechanism which extends the timeframe for providing the offer to connect to accommodate other NSPs or AEMO (cl. 5.3.6(a2)). The parties can already seek to extend the four month timeframe under *reasonable* circumstances. Clearly, delays caused by third parties would fall into the category of a 'reasonable' need to extend therefore draft final cl. 5.3.6(a2)(1) is effectively duplicative and unnecessary. The CEC also notes that removing subparagraph (1) is in line with the Commission's stated position with respect to a stop-the-clock mechanism³.

In addition it would not always be the case that a single response from a third party can delay the processing of an entire connection application. Allowing the DNSP to deliver within a four month period (or seek agreement to extend) as proposed would create greater importance on continuing to process those parts of the application which do not require third party input.

1.2 Availability of up-front information

The CEC supports the maximisation of publicly available information. The Commission's position on enhanced publication of technical requirements clearly meets this objective. Furthermore, it will encourage the development of technical standards in the short term, enable generator proponents to take a fully informed view of the implications of the

¹ AEMC 20014, Connecting embedded generators, Position Paper, 30 January 2014, Sydney, www.aemc.gov.au.

² Position Paper, p. 27.

³ Position Paper, p. 31.

connection and provide an understanding of the level of expertise needed to address the technical challenges of a connection.

In order to properly address the diversity of embedded generation sizes and technologies clauses 5.3A.3(b)(2) and (3) should require that single line diagrams and sample schematic diagrams are provided for different classes of embedded generator.

The information pack should be required to include those aspects of a connection which are contestable in the relevant jurisdiction. This inclusion should be uncontroversial but would complete the information provided and support the DNSP's need to limit connection costs as needed in the detailed response and offer to connect. It will also maximise the time that connection applicants have to consider competitive suppliers for these aspects of the connection.

The CEC requests that the Commission explains the intent of cl. 5.3A.3(6)(ix) as the meaning of 'aggregation' is unclear and the position paper does not clarify the intent of this clause.

The CEC also requests that the Commission considers including the obligations on the parties at each stage within the connection process within the description of the process defined by cl. 5.3A.3(b)(1). This should be an uncontroversial addition which remains consistent with the publication of information and a description of the process.

1.3 Itemised statement of connection costs

The CEC supports the enhanced approach to connection costs with estimates provided with the detailed response and actual costs provided with the offer to connect. The inclusion of the costs of interface equipment is an advancement however, the wording of this subparagraph is ambiguous. It is "*interface equipment required to provide the connection and associated costs*" which are relevant, rather than "*contained in the offer to connect*" as drafted.

The CEC accepts the Commission's justification for omitting the addition suggestions for a scope of work and statement on the basis on which charges were calculated.

The CEC supports the requirement to justify deviations from cost estimates in the final costs set out in the offer to connect. This is a significant advancement which should enhance accountability for costs estimates without restricting flexibility in offerings or the physical needs of the connection.

1.4 Preliminary enquiry stage

Timeframes

The CEC supports the proposed timeframe of 5 days as this is consistent with Chapter 5A and this change has an extremely low material effect on the process.

The CEC supports the proposed 15 day timeline for provision of the preliminary response as this is entirely reasonable given the scope of the material to be provided in the response. Agreement to extend if necessary is also a reasonable inclusion (see previous comments).

Information requirements

The CEC supports the amendment of the leading paragraph in cl. S5.4(a) which removed the reference to minimum technical requirements but retained the obligations on relevant technical information which is readily accessible. Furthermore, the combined intent of paragraphs (a) and (b) create the framework for the enquirer to access all relevant technical information to undertake further analysis of the connection, and proceed fully informed to the detailed enquiry response stage.

The CEC supports the clarifications made to the description of the technical information, and source of fault level information.

As stated in the previous submission⁴ the CEC supports the removal of draft cl. S5.4A(d) which stipulated that the DNSP nominate whether negotiated access standards are to be required. This arrangement contradicted the NER's negotiation process set out in cl. 5.3.4A. However, while not critical in the preliminary response the Commission should be aware that the removal of draft paragraph (d) has also removed the obligation to notify the enquirer of the negotiated access standards which may require the Australian Energy Market Operator's (AEMO) involvement⁵ (also see comments in Section 1.5 on the same change in the detailed response).

The CEC supports the inclusion of consideration of available connection options which the enquirer may have available, and the high level information to be provided for each option. This inclusion should provide a clear indication to the enquirer on the appropriate avenue to address an efficient connection relative to the generation scale and technology. However, the wording in cl. S5.4A(n) is vague and needs reconsidering and should be amended to include that the DNSP should indicate a preferred option.

The CEC supports the proposal to provide an indication of whether network augmentation may be required, and the description of what augmentation may be required. DNSPs hold the requisite knowledge and much of the experience to make this assessment. Therefore the CEC considers it entirely reasonable that a preliminary indication is provided at this stage of the process.

While the removal of draft cl. S5.4A(m) may be reasonable, this places greater weight on retaining the publication of the model connection agreement in the information pack.

Enquiry fee and to request the detailed response

The CEC supports the proposed changes to the estimate of the enquiry fee, and the component of it required to be paid when requesting the detailed response.

⁴ CEC Submission to the ERC0147 Draft Determination, p-p. 19-20.

⁵ See further comment on the information to be provided in the detailed response in cl. S5.4B(b).
Clean Energy Council | Submission to ERC0156 Publication of Zone Substation Data: Draft Determination |
20/02/2014

Ability to bypass the preliminary enquiry stage

The CEC supports this inclusion as it may provide a benefit to some connection applicants, and save time for some DNSPs who may have comfort that the applicant is experienced enough to take this avenue.

Agreement between the parties is critical to the success of this policy as some DNSPs may see this as an avenue to pressure the applicant into skipping the provision of information stipulated in the preliminary response.

1.5 Detailed enquiry stage

The CEC supports the two-stage enquiry framework as this should enhance the capacity for connection applicants to make efficient decisions based on the highest levels of information available at the relevant stages.

Removal of the validity period between the preliminary and detailed enquiry stage

For the reasons outlined by the Commission⁶ the CEC strongly supports this change from the draft rule. Generator proponents are already taking on the costs of developing and establishing the connection and the risks posed by connection offers which generally contain no limit on the generator's liability.

As stated in the November 2013 workshop generators have to accept a trade-off between:

- (a) A tight timeline within which the DNSP will prescribe onerous connection requirements that meet its criteria of sufficient risk reduction, based on limited assessment, or;
- (b) A more relaxed timeframe which allows the connection requirements to be properly assessed and efficient outcomes derived that meet the generator's needs of efficient costs and managed risk, while also supporting the DNSP's risk reduction criteria.

The NERs already allow for option (a) through the use of automatic access standards or plant standards. These standards are deliberately set at a high level above "do no harm" in order to reduce the NSP's risk profile. A validity period of this nature, and at this stage in the process, therefore will only increase the generator's exposure to risk by forcing the DNSP to select option (a).

Option (b) is therefore always the preference as the connecting party can manage the development of efficient connection arrangements and their exposure to risk in a staged and appropriately timed decision making process. This process ultimately leads to project financing, once the connection offer is received, as only this document clarifies the project's costs and risk profile, which in turn leads to efficient costs of finance for the project.

It is not clear that the inclusion of the validity period will enhance the recourse available to connection applicants at all. Given the regulated monopoly nature of DNSPs *recourse* could

⁶ Position Paper, p. 24.

only be sought through arbitration if there were any issues. This in itself would simply create further difficulties and increased cost and risk for the connection applicant.

As it is entirely unclear that option (a) provides any benefit to either party, the CEC supports the omission of validity periods in the Commission's final rule. Through increased information transparency and clearly defined obligations on the parties and timelines, the draft final rule provides the appropriate reinforcement for the current circumstance⁷.

Optionality to agree on a validity period for the detailed response

The CEC is aware of the Commission's opinion that the option exists for DNSPs to include a commercial arrangement whereby the parties can agree on a validity period and reservation of part of the network's power transfer capability for this period.

This does not appear to be the experience of CEC members. In order to test this however the CEC has run a brief survey of members by asking if a validity period is applied to a DNSP's connection enquiry responses, and, if so, how long is it and does it infer reserving power transfer capability.

Responses were received from 6 generation developers. 31 connection enquiry responses were considered. These had been provided by a diverse set of DNSPs covering most of the NEM. Of the responses none considered or proposed reserving the network's power transfer capability (for a fee, or otherwise).

Only one DNSP includes a validity period for the *initial* response required by clause 5.3.3(b) which only contains very high level information. The second, more detailed, response under 5.3.3(b1) from this DNSP is not subject to the same condition.

On this basis the CEC believes that the Commission's understanding of current practice is misguided. If this commercial arrangement exists now, it does not appear to be in use at all. The CEC suggests that there is no benefit to including this clause in the final rule. It will only serve to confuse the fact that this agreement can be made under a commercial arrangement outside of the rules. Further, including it in the final rule will create an inconsistency with the remainder of the NER as this concept is not included in any other NER-defined connection process.

The CEC believes that the key to ensuring that the information that is at hand is valid is requiring the DNSP to be accountable for the information they provide and providing advise if the information changes subsequent to the detailed response being provided.

Clause 5.4B(n) should therefore be amended such that the proposed option for a validity period mechanism be replaced with a mechanism where the DNSP writes to confirm the connection applicant's intention of proceeding with the application to connect every 3 months after the detailed response has been provided. In doing so the DNSP must also be required to confirm whether there have been any changes to the network that may affect the currency of the information provided in the detailed response.

⁷ Position Paper, p. 24.

Given that the enquirer is paying the DNSP for the response it is reasonable to expect that this inclusion is uncontroversial as the associated costs can easily be included in the fee.

Timeframe for a DNSP to provide a detailed enquiry response

The CEC supports the retention of the 30 business day response time, and the framework for agreeing to extend the timeframe.

Information to be included in the detailed enquiry response

As stated in the previous submission⁸, and previously in Section 1.4, the CEC supports the removal of draft cl. S5.4B(b) which stipulated that the DNSP nominate whether negotiated access standards are to be required. This arrangement contradicted the NER's negotiation process for access standards as set out in cl. 5.3.4A which the CEC does not recall ever being brought into question by the rule change proponents or any other stakeholder in this rule change.

However, the replacement of paragraph (b) has omitted the obligation to notify the enquirer of the negotiated access standards which may require the AEMO's involvement. This information is crucial to the detailed response as it will provide the enquirer with a clearer picture of their obligations and expectations for the application process. The new paragraph (b) should align the detailed response obligations with the existing cl. 5.3.3(b1).

The CEC supports enhanced detail on the technical requirements for connection at this stage of the process.

Draft final rule cl. S5.4B(e) is misleading as a connection applicant should assume that negotiate access standards will be required, even if they are proposing that they will meet the automatic access standards. The following reasons apply

- DNSP-nomination of negotiated access standards is inconsistent with the current cl. 5.3.4A which prescribes that the connection applicant nominates the negotiated access standards that it wishes to negotiate with the NSP.
- In almost all connections the aspects of the access standards which require negotiation are mostly unknown until a detailed set of power system studies has been carried out to demonstrate the generator's performance. This demonstration is required even if the generator is nominating automatic access standards and it is likely that the analysis will lead to some of the proposed automatic access standards being reduced to negotiated as they would have imposed an unnecessary cost on the project. As these studies have not been carried out yet there is no way that the DNSP, or the connection applicant could know this information at the detailed enquiry response stage.

Therefore, the CEC supports the removal of cl. S5.4B(e) entirely in the final rule.

Although discussed in the position paper⁹ the new clause which replicates the technical information required to be provided to undertake network studies to determine the negotiated

⁸ CEC Submission to the ERC0147 Draft Determination, p-p. 19-20.

⁹ Position Paper, p. 26.

access standards does not appear in draft final rule S5.4B. This is a critical aspect of the detailed response and must be included as intended by the Commission.

The CEC supports the placement of advice on approvals in the detailed enquiry response, rather than the preliminary responses. This is consistent with the types of information that the detailed response should provide.

Removal of the “agreed project” concept and “fast-tracked connection application” process

The Commission’s proposed framework meets all of the criteria for the connection applicant and the DNSP to come to agreement on an ‘agreed’ project. This framework is significantly more advanced as the draft final rule allows both parties to fully discuss and understand the costs and risks prior to reaching this agreement.

The “agreed project” and “fast track connection application” only created additional unnecessary pressure on a connection applicant in this critical decision-making period of the project’s development. As such the CEC supports the Commission’s decision to exclude them from the final rule.

1.6 Connection application process

The CEC supports the Commission’s proposed connection application process.

See previous comments on the four month period for making the offer.

Timeframe for connection applicant to accept the offer to connect

The CEC supports the instilling of the current practise of a 20 day period into the NER. In addition the inclusion of extension by agreement is an advancement of the current Chapter 5 as this is currently under-prescribed.

1.7 Dispute resolution

The CEC accepts the retention of the current Chapter 8 dispute resolution process under the condition that the draft final rule outlines that technical disputes related to connection can be mediated through this process. As noted by the Commission embedded generation proponents have differing levels of experience¹⁰. In order to ensure that stakeholders are fully informed the CEC requests that the Commission outline how the process for seeking arbitration over a technical dispute may work in practice when making the final determination.

On this basis that the Chapter 8 dispute process does not omit the introduction of an independent expert the CEC accepts this being removed in the draft final rule.

¹⁰ Position Paper, p. 21.

1.8 Technical requirements for connection

Automatic right to export electricity

The CEC refers the Commission to previous submissions which outlined the CEC's position on an "*automatic right to export electricity*"^{11,12}.

Publication of system fault level limitations

The CEC agrees that the DAPR will provide sufficient information.

Register of completed projects

While the CEC accepts the Commission's proposed register some questions remain on how confidential information is to be managed.

Firstly, "connected" is undefined. Is the intent that only generators which have completed the physical connection are to be included, the signing of a connection agreement, commissioning or something else?

Secondly, some aspects of the information are included in the generator performance standards which are a component of connection agreements. Therefore, they contain by nature *confidential information* and conflict with cl. 5.4.5(b). This includes (b)(2), (3), (5), (6), and (7) and, if included, the make and model of the generating unit(s) would also fall into this category.

Thirdly, the draft final rule creates no clear linkage between the register being created and updated and its publication. Is it intended to be a component of the annual planning report, or kept on the DNSP's website and updated in sync with the planning report or optionally either? Draft final rule cl. 5.4.5 does not make this clear, nor do the amendments to Schedule 5.8.

"Protection systems" should be complemented by "communications systems" in draft final rule cl. 5.4.5(b)(6).

1.9 Connection charges and the cost of network augmentation

The CEC supports the Commission's position on detailed cost breakdowns.

Given the current NEM framework for network investment and use of system charging a new charging structure, as proposed by the rule change proponents, would require significantly more investigation than a rule change process allows for. While the CEC supports the Commission's position on the costs of network augmentation at this point in time the changing nature of network use may require this issue to be revisited as a component of future market reform challenges.

¹¹ CEC Submission to the ERC0147 Draft Determination, p. 23.

¹² CEC Submission to the ERC0147 Issues Paper, p. 8.

1.10 Commencement date of draft final rule and transitional arrangements

The CEC agrees with the 6 month commencement timeline following the publication of the final determination as this would provide DNSPs with sufficient time to prepare for the rule's implementation.

The CEC expects that the transitional arrangements proposed in the draft rule were sufficient. They would enable the new process to be accessed immediately for some connection enquiries that may be underway already. This would also enable flexibility to fully transition to the new process if the DNSP prefers as the DNSP can request agreement to do so from current enquirers. The status of the enquiry and application process can determine the relevant stage in the new process to be applied by.

It is not clear that there is any benefit to restricting a detailed cost estimate to generators below 30MW during the transitional phase. This breakdown should be applied to all offers to connect made after the commencement date.

1.11 Civil penalty provisions

The draft final rule only applies civil penalties to clauses S5.4B(f), (g) and (m) which is only partly consistent with the existing cl. 5.3.3.

Considering the draft final rule against the existing cl. 5.3 highlights a number of clauses for which the civil penalty provisions have been removed in the draft final rule. These include clauses 5.3A.7(b), 5.3A.8(c) and a number of clauses in the preliminary and detailed responses, including S5.3A(c)-(f), (o) and (s); and S5.3B(b)-(d) and (o). Combined this appears to be a significant relaxing of the existing civil penalty provisions.

The CEC believes that the intent of the current civil penalty provisions within cl. 5.3.3(b), (b1) and (c) are that the DNSP must provide the information relevant to the connection enquiry such that the connection applicant can make an informed decision on their investment and fully appreciate the commercial implications of their decisions. These clauses specified this information as it is clearly required.

There does not appear to be any material difference in the information included in the preliminary and detailed responses is required for exactly the same reasons as the information which is currently subject to civil penalty provisions in cl. 5.3.3. Therefore the CEC believes that making the entire preliminary and detailed responses subject to civil penalty is consistent with the spirit of the existing civil penalties and should be uncontroversial given the consultation that has led to the inclusions in each response.

Therefore the Commission should apply civil penalty provisions to cl. 5.3.7(a) and cl. 5.3A.8(g) (to apply to the entire cl. S5.4B) in the final rule.

2 CEC Detailed responses to the Commission’s draft final rule

In light of the above discussion the CEC proposes the following changes to the wording in the draft final rule.

Final Draft Clause	Issue	Proposed Solution
5.3.1A	Spelling in heading is ambiguous	Rectify duplication of the word “to” and replace second occurrence with “of”.
5.3.1A(a)	The term “ <i>unless otherwise provided</i> ” is ambiguous. The draft final rule doesn’t provide for anything else.	Delete “ <i>unless otherwise provided</i> ”.
5.3.6(a2)(1)	The retention of the ‘stop-the-clock’ mechanism or TNSP or AEMO responses appears to be at odds with the Commission’s stated position in the position paper (p. 31).	Delete subparagraph (1).
5.3.6(b3)	Agreement to extend the offer’s validity period should not be unreasonably withheld.	Include that agreement should not be unreasonably withheld in cl. 5.3.6(b3).
5.3.7(a)	Spacing error in inserted text.	Rectify error.
5.3A.2(a)	Error in defined term “zones substation”	Rectify error: “zones substation”
5.3A.3(b)	Include publication of which aspects of a connection are contestable within the relevant jurisdiction	Include new subparagraph stating that the DNSP is to include a description of which aspects of a connection are contestable in the relevant jurisdiction.
5.3A.3(b)(1)(ii)	Include that the information must stipulate the obligations on each party at each step in the connection process.	Amend subparagraph (ii) to “application process <u>and the obligations one each party at each stage of the process;</u> ”

5.3A.3(b)(1)(v)	Include “and” at end of paragraph.	Rectify error.
5.3A.3(b)(1)(vi)	Clarify intent of subparagraph to apply to “negotiation of <i>negotiated access standards</i> ”.	Rectify omission.
5.3A.3(b)(2) and (3)	Include that this information is required for different generator classes as the requirements can be very diverse based on generator class.	Insert “ <u>for different classes of embedded generator</u> ” at the end of each subparagraph.
5.3A.3(6)(ix)	Clarify the term “aggregation”.	Update clause as needed pending clarification.
5.3A.4(e)(1)	Rectify apparent error: “...for <u>cover</u> work...”	Rectify error.
5.3A.7(a)	Insert civil penalty provisions to align with intent of existing provisions in clauses 5.3.3(b), (b1) and (c).	Insert civil penalty provision to apply to all parts of S5.4A.
5.3A.7(b)	Insert civil penalty provisions to align with intent of existing provisions in clause 5.3.3(c)(5).	Insert civil penalty provision.
5.3A.7(c)	Extend the obligation to agree on an extension to include agreement on a new date for the preliminary response to be provided at the time the parties are agreeing to extend.	Edit clause: “...reasons required for the extension <u>and proposing the date the preliminary response will be provided by.</u> ”
5.3A.8(f)	Extend the obligation to agree on an extension to include agreement on a new date for the detailed response to be provided at the time the parties are agreeing to extend.	Edit clause: “...reasons required for the extension <u>and proposing the date the detailed response will be provided by.</u> ”
5.3A.8(g)	Amend clause to apply civil penalty provisions to entire detailed response to align with intent of existing provisions in clauses 5.3.3(b), (b1) and (c).	Amend clause to apply civil penalty provisions to all parts of S5.4B.
5.3A.9(b)	Clarify reference clause S5.4B(o).	Check intended reference clause and rectify if erroneous.

5.3A.10(a)(2)	Defined term <i>negotiated access standard</i> no italicised.	Italicise term.
5.3.5	Clarify publication obligations for register.	Update relevant clauses.
5.4.5(b)(6)	Include communications systems along with protection systems.	Insert " <i>protection systems and communications systems</i> ;
5.4.5(d)	Review reference to "review date" at end of paragraph.	Update to "DAPR date" if this is the intention.
S5.4A(h)	Clarify constraints "of the network"?	Suggest replacing "of" with "on".
S5.4A(n)	Clarify clause.	<p>Suggest the following amendments:</p> <p>"an overview of any available options for <i>connection to the Distribution Network Service Provider's a network</i>, as relevant to <u>the an enquiry lodged, at more than one connection point in a network</u>,</p> <p>including:</p> <p>(1) example a single line diagrams and relevant <i>protection systems and control systems used by of</i> existing <i>connection</i> arrangements;</p> <p>(2) <u>a description of the different</u> characteristics of supply; and</p> <p>(3) an indication of the likely impact on terms and conditions of <i>connection</i>,</p> <p><u>as relevant to at each optional differing</u> <i>connection point</i>."</p>
S5.4B(b)	Insert obligation to advise on any negotiated access standards which may require AEMO's involvement.	Insert copy of existing cl. 5.3.4A(h)(3).
S5.4B(e)	Delete clause entirely as negotiated access standards would not have been assessed or proposed by the connection applicant at this point in the process.	Delete clause.

<p>S5.4B(n)</p>	<p>Delete clause as this is not current practice, and has no bearing on the connection process, the information provided to the applicant and is not current practice for generator connections.</p> <p>Insert clause that requires the DNSP to remain accountable for the data they provide and consider the status of the application, commensurate to the detailed response fee.</p>	<p>Delete current clause.</p> <p>Amend to require that, at three month intervals, the DNSP confirms the validity of the data provided in the detailed response, provides updates to it where necessary, and confirms the status of the connection application.</p>
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