

# SIEMENS

The Chairman  
Australian Energy Market  
Commission  
PO Box A2449  
Sydney South NSW 1235

Siemens Ltd  
(A.B.N. 98 004 347 880)

Your Reference

Our Reference

Date  
Melbourne, 18/6/08

Dear Sir

## Re: National Electricity Rules ("Rules"): Rule Change Proposal Confidentiality Arrangements in Respect of Information Required for Power System Studies

Thank you for your invitation to comment on the above.

While we are aware of the need for arrangements to be continually reviewed to progress the efficient operation of the National Electricity Market ("NEM"), Siemens, as a manufacturer, has serious concerns with the operation of the proposed new Rules and do not support the NGF's initiative.

In particular, we would like to highlight the following:

Confidentiality agreement – We support DlgSILENT's submission for this proposed Rule which suggested that information should only be provided subject to a confidentiality agreement being in place, in particular between the recipient and the discloser. The current confidentiality arrangements in the Rules have worked to a certain extent (especially from NEMMCO's perspective) save that as a manufacturer, Siemens would prefer confidentiality agreements being entered into between the manufacturers (discloser) and the Registered Participants, Network Service Providers and NEMMCO respectively. All manufacturers require the additional comfort for its commercially sensitive information in addition to any legislative protection (which may change from time to time).

Existing model database includes data and source code from multiple sources - NEMMCO currently holds a large amount of model information for the majority of generating units and generating systems in the NEM. We propose that the new provisions be inserted to ensure that such information may only be released in accordance with these new Rules upon notification, receiving the consent of the original discloser of such information and a confidentiality agreement being put in place.

**We make the  
INVESTMENTS  
of our CUSTOMERS  
BETTER**

Originator

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Notification prior to release – We agree with Vestas' submission regarding measures to ensure that (i) the original discloser of a dynamic model is notified of the release of the information, and (ii) there is greater clarity of the numerical parameters in the dynamic model. Presumably, the latter amendment aims to have the PSS/E dynamic data (\*.dyr) file, or its equivalent fall within the scope of a 'releasable user guide', allowing dynamic model data to be provided similar to the pre-2007 situation. However, notification by itself is not sufficient and a comprehensive process needs to be inserted to enable objections by the discloser of the information

Consultants and other parties involved in power system research - we note that some of the submissions by McLennan Magasanik Associates, DigSILENT Pacific and Econnect regarding the release of such information to consultants and other interested parties all go further than that which Siemens would be comfortable with. In any case we would categorically be opposed to any Rule change which would permit the supply to and retention of power system static and dynamic data by a broader range of recipients than that presently proposed, including consultants and researchers.

If you have any queries or require clarification, please do not hesitate to contact us.

Yours faithfully



**Richard Lim**  
Legal Counsel  
Siemens Ltd

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