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Mr Istvan Szabo
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted online via www.aemc.gov.au

25 May 2017

Reference ERC0219

Dear Mr Szabo,

AGL welcomes the opportunity to comment on the Australian Energy Market Commission's (AEMC) Consultation Paper on Generating System Model Guidelines (Consultation Paper).

AGL is one of Australia's leading integrated energy companies and largest ASX listed owner, operator, and developer of renewable generation. Our diverse power generation portfolio includes base, peaking and intermediate generation plans, spread across traditional generation fuel sources as well as renewable sources. AGL is also a significant retailer of energy, providing energy solutions to over 3.7 million customers throughout eastern Australia. The views in this submission reflect AGL's considerable experience.

AGL considers that the rule change reflects the content of AEMO's current information requests for new generator connections and consequently a rule change is unnecessary. Additionally, and specifically in response to Question 11, AGL does not support allowing AEMO to retrospectively request modelling data from existing generators who are already registered and have executed connection agreements. On this point, AGL considers that additional data for existing generators is unlikely to be available for a variety of reasons, including equipment manufacturers no longer making the equipment used in the power system models. Further, even if such information were available, the costs of compliance would be very high due to the work involved in transforming existing generation model system data to the EMT-type model format requested.

If you have any queries about the submission or require further information, please contact Brigid Richmond at brichmond@agl.com.au or on (03) 8633 663.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Camroux'.

Simon Camroux
Manager Wholesale Regulation