

Sebastien Henry
Australian Energy Market Commission
Level 5
201 Elizabeth Street
Sydney NSW 2000
By online lodgement on www.aemc.gov.au

25 November 2011

Dear Sebastien,

Re AEMC Draft Determination on consultation ERC0120: Definition of Temporary Over-Voltage Limits

International Power-GDF Suez Australia (IPRA) appreciates the opportunity to comment on the draft determination by the Australian Energy Market Commission (Commission) on temporary over-voltage limits.

IPRA agrees with the Commission's considerations relating to the proposed Rule change, that:

- the proposed Rule change would potentially impose additional costs on existing participants and introduce a barrier to entry
- technical limitations would appear to prevent the application of the Rule change at George Town, the only likely location that the Rule change would be applicable.

As the proposed Rule change would introduce additional costs for no apparent benefit, IPRA supports the Commission's decision not to make the Rule change.

IPRA also acknowledges the Commission's comments that the submissions on the proposed Rule change have revealed a potential lack of due process in the current Rules in relation to making changes to the *normal voltage* at a *connection point*. As the Commission has indicated that it is open to a consideration of this as the subject of a separate Rule Change Request, IPRA notes that it will be proposing a new Rule Change Request on this matter in the near future.

Should you have any enquiries regarding this submission please do not hesitate to contact me on 03 9617 8331.

Yours sincerely,



Chris Deague
Senior Market Specialist