

3 November 2005

Dr John Tamblyn
Chairman
Australian Energy Market Commission
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Australia Square NSW 1215

Dear John

AEMC Draft Rule Determination – Publication of Information for Non-Scheduled Generation – September 2005

Thank you for the opportunity to comment on the Australian Energy Market Commission's draft Rule determination regarding the publication of information for non-scheduled generation. NEMMCO has one comment to make regarding the draft Rule determination. This point relates to the wording of clause 3.13.4(s).

As currently drafted, the new clause 3.13.4(s) reads:

- (s) Where *NEMMCO* publishes details as referred to in clause 3.13.4(r) and the *nameplate rating* is less than 30MW, the requirement to *publish* applies only to data available to *NEMMCO*.

Clause 3.13.4(r) in turn reads:

- (r) Each *day*, in accordance with the *timetable*, *NEMMCO* must *publish* details of actual generation for each *non-scheduled generating unit* or *non-scheduled generating system*, in each *trading interval* for the previous *trading day*.

NEMMCO does not currently have SCADA operational metering that would allow the publication of actual generation data for all non-scheduled generating units or systems in the NEM. In particular, NEMMCO does not have SCADA operational metering for some non-scheduled plant with nameplate ratings greater than 30MW.

It is NEMMCO's belief that the intention of clause 3.13.4(s) was to require NEMMCO to publish generation data for only those non-scheduled generating units or systems for which SCADA operational metering data already existed. As currently worded, clause 3.13.4(s) would relieve any obligation on non-scheduled plant with nameplate ratings less than 30MW to install SCADA operational metering data if they did not already have it. However, clause 3.13.4(s) may also be interpreted to mean that non-scheduled plant with nameplate ratings greater than or equal to 30MW would be required to install SCADA operational metering, in order for NEMMCO to be able to publish actual generation data as required by the proposed Rules.

If the intention of clause 3.13.4(s) was to require NEMMCO to publish generation data for only those non-scheduled generating units or systems for which SCADA operational metering data already existed, independent of the size of their nameplate rating, then this could be achieved by removing the words "and the nameplate rating is less than 30MW" from the clause as currently drafted.

However, if an intention of clause 3.13.4(s) was to require NEMMCO to publish generation data for all non-scheduled generating units or systems with nameplate ratings greater than or equal to 30MW, then NEMMCO believes that this would place an obligation on NEMMCO to require all such non-scheduled plant to install SCADA operational metering, if they do not already have it, in order for NEMMCO to be able to comply with the proposed Rules. Furthermore, if this was the intention of clause 3.13.4(s), then it might be necessary to introduce transitional arrangements to allow non-scheduled plant with nameplate ratings greater than or equal to 30MW sufficient time to meet the new requirements, in cases where such plant does not already have SCADA operational metering.

Yours sincerely



Brian Spalding
Chief Operating Officer