

Anita Lai  
The Reliability Panel  
Australian Energy Market Commission  
PO Box A2449  
SYDNEY SOUTH NSW 1235

By online submission

8 February 2012

Dear Anita,

**Re Consultation: REL0047 Template for Generator Compliance Programs**

International Power-GDF Suez Australia (IPRA) appreciates the opportunity to comment on the Reliability Panel's issues paper Template for Generator Compliance Programs (template).

In response to the specific questions posed by the Reliability Panel in the issues paper, IPRA offers the following comments:

**The Panel welcomes any comments on whether any changes to the Rules have impacted the template.**

IPRA are not aware of any Rule changes that have impacted in a material way since the Reliability Panel established the template in 2009.

**What changes to technology have occurred (if any) which should be reflected in the template?**

As wind generation technology had been operating in the national electricity market prior to 2009 when the Reliability Panel established the template, IPRA assume that any technology requirements associated with wind generation have been considered already.

IPRA are not aware of any substantial new technology that has become established in the national electricity market since 2009. If the large scale solar generation projects that have been proposed by the federal government become a reality, then this would require a detailed examination to consider the implication for the template.

**The Panel welcomes any comments on whether any changes to the performance standards have impacted the template.**

IPRA are not aware of any substantial changes to the performance standards that have impacted on the template.

**What have stakeholder's experiences been with the template? Are there any suggestions to improve or clarify the template?**

IPRA have found the template helpful in developing our compliance processes and procedures. We cannot suggest any substantial improvements at this time.

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

Yours sincerely,



Chris Deague

Senior Market Specialist