

10 July 2009

Dr John Tamblyn
Chairman
Australian Energy Market Commission
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By email : submissions@aemc.gov.au

Dear John,

Rule Change - Bid and Offer Validation Data (ERC0091)

TransGrid thanks the AEMC for the opportunity to respond to the Rule change proposal, entitled "Bid and Offer Validation Data", and would like to offer its support.

The proposed rule change seeks to modify the data requirements of schedule 3.1 to ensure they are consistent with the information required, in practice, for market operations.

The proposed change also has the additional benefit of promoting the reliability, safety and security of the national electricity system.

The change to schedule 3.1(d) to include the phrase "...must be consistent with NEMMCO's register of performance standards for the relevant plant" will enhance the alignment between the market systems, AEMO's registered performance standards and therefore the connection agreements between network service providers and generators. This will increase the assurance that the market systems direct the market within its technical envelope.

The removal of the poorly defined "additional emergency generation above registered capacity MW" term from Schedule 3.1 will also promote reliability, safety and security. This removes a risk that generators may operate in an overloaded capacity where the consequences to the national electricity system have not been adequately assessed.

TransGrid would be happy to discuss any of the issues raised in this submission, and please feel free to contact either myself on (02) 9284 3553 or via e-mail: garrie.chubb@transgrid.com.au or Mr Michael Bradbery on (02) 9284 3090 or via e-mail: michael.bradbery@transgrid.com.au

Yours sincerely,

 10/07/2009

Garrie Chubb
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