

21 July 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

By email: submissions@aemc.gov.au

Dear Mr Pierce

ERC0205: Register of Large Generator connections — Consultation Paper

Transmission General Holdings (Australia) Pty Ltd (**TGHA**) welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC**) consultation paper relating to a register of large generator connections.

TGHA notes that much of the information proposed to be contained on the register appears to already be held by the Australian Energy Market Operator (**AEMO**). If the rule change is implemented, TGHA considers that it should be applied to the incumbent Transmission Network Service Provider (**TNSP**), or the TNSP that is responsible for publishing the Transmission Annual Planning Report (**TAPR**) in an adoptive jurisdiction. We expand on these points below.

Information for register already exists

The rule change proposes that TNSPs must establish and maintain a register of information regarding large generator connections. The information proposed to be included on the register includes the node connection point, the generator's nameplate capacity and technology type, as well as information relating to registration with AEMO.

As acknowledged by the AEMC in its consultation paper, the majority of this information is currently made publicly available by AEMO. Presumably, it is supplied to AEMO through the registration process. TGHA considers that if there is a deficiency in the information that is made publicly available by AEMO, then it may be preferable to enhance that information set rather than create an unnecessary duplication of information, which increases costs and adds confusion as to where the information can be sourced.

Rule change should be applied to the TNSP that prepares the TAPR

Incumbent TNSPs are responsible for planning, constructing, and operating the shared transmission system, and arranging connections to it. In Victoria, AEMO is ultimately accountable for the declared shared transmission network.

The rule change proposal sets out that an impact assessment of the connection should be undertaken 12 months prior the generator being commissioned and 12 months after being commissioned. The report should be published within 18 months after the generator is connected. The information proposed to be included in the impact assessment includes:

- changes to the level and pattern of network congestion;
- differences in the timing of network expenditure for the TNSP; and
- changes in the level of interconnector transfer capability.

We consider that the impact assessment is unlikely to provide additional valuable information. The impact of a new generator connection would be reflected in the forecasts of loads or constraints in the TAPR published by the incumbent TNSP, or AEMO in an adoptive jurisdiction.

However, should the AEMC be minded to implement this rule change proposal, then it could be included as part of the requirements for the TAPR. Consequently, the rule change proposal should only apply to the incumbent TNSP or the TNSP that is responsible for publishing the TAPR in an adoptive jurisdiction

If you have any questions in relation to this submission, please contact Renate Vogt on 03 9683 4082 at first instance.

Yours sincerely

A handwritten signature in blue ink that reads "Eric Lindner". The signature is written in a cursive style with a long horizontal stroke at the end.

Eric Lindner
Chief Executive Officer