15 October 2019

John Pierce
Chairman
Australian Energy Market Commission (AEMC)
PO Box A2449
SYDNEY SOUTH NSW 1235

By online submission.

Dear Mr Pierce

Generator compliance template review 2019 (REL0070)

Hydro Tasmania appreciates the opportunity to make a submission in response to the Reliability Panel's Generator compliance template review 2019.

Hydro Tasmania has fifty registered hydro generating units with a capacity of over 2250 MW and is also the owner of AETV Pty Ltd. With such a significant number of generating units, efficient and effective generator compliance monitoring is a matter of significant interest to our business.

Hydro Tasmania is appreciative of the opportunity to provide feedback on the proposed Generator compliance template and in general supports the proposed template, but requests the inclusion of specific additional methods for:

- S5.2.5.13 (Voltage and Reactive Power Control / Excitation Control System):
  - Hydro Tasmania proposes that the same method is used as per method 1 for Clause S5.2.5.11 (frequency control), this should be included as an additional method for Clause S5.2.5.13, as both modern digital governor and excitation systems and their associated models provide the same technological capabilities to leverage off.

- S5.2.7 (Power station auxiliary supplies):
  - Hydro Tasmania proposes that the pre-existing method 2, currently used by Hydro Tasmania, should remain part of the template. This suits the arrangements that apply to our hydro-electric generators, where auxiliary supplies are generally sourced as retail supplies from the local distribution system. These relatively small auxiliary loads (compared to thermal units) are usually supplied at 415 volts.

The wording of the proposed additional methods have been outlined in Attachment A.

If you have any queries on this submission or require further information please contact Hendryk Klempke 0428 833 381 or via email Hendryk.Klempke@hydro.com.au .

Yours sincerely

John Cooper
Regulatory Manager

Performance Standard	Suitable testing and monitoring methodology	Suggested frequency of testing	Notes	Basis for compliance assessment
S5.2.5.13	Method 4 (of 4): Monitor in-service performance using high speed frequency data	After every major voltage disturbance	Appropriate to use where high speed monitors are available and models have been used in establishing compliance	Consistency of operation with the latest plant model provided in accordance with clause S5.2.4 if the models are available; OR consistency with past performance only if the models are not available
S5.2.7	Method 2 (of 2): Performance will be monitored as part of condition monitoring and maintenance routines		This standard only applies to generating systems that take auxiliary supplies from a separate supply.	Achieve performance standard