



17 October 2019

Mr Charles Popple
Chair – Reliability Panel
Australian Energy Market Commission

Lodged via the AEMC website

Dear Mr Popple,

REL0070: Generator Compliance Template Review – 2019

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in renewable energy and energy storage along with more than 6,000 solar and battery installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The CEC welcomes the opportunity to provide comment on the Australian Energy Market Commission (AEMC) Reliability Panel's draft report on the Generator Compliance Template Review – 2019. The CEC was asked by the AEMC to nominate CEC members to participate in the technical reference panel to provide industry advice on the development of recommendations for consideration of the Reliability Panel. We appreciate the AEMC requesting our members participation in the technical reference panel and trust that the input they provided was valuable to the process.

The CEC is broadly supportive of the draft report and the direction proposed. We support the draft recommendations developed by GHD with further refinement from the technical reference panel.

We would like to make comment regarding the following note in the draft report:

*'The Panel notes that a rule change would be required to implement a new obligation on NSPs to notify generators following the occurrence of a major event. As a result, this is an issue that is beyond the scope of this review of the template to address. Interested stakeholders may consider submitting a rule change request on this matter.'*¹

The CEC supports the intent of this point to create a requirement on NSPs to notify generators following the occurrence of a major event. We do however recognise that this potential rule change is out of scope of the review process and would need to be developed and progressed as an independent rule change request following the completion of this process. We suggest the AEMC Reliability Panel outline in its final report which party it considers would be best placed to progress the rule change request to create this requirement.

¹ AEMC, Generator Compliance Template Review – 2019 draft report, p 11, 19 September 2019, accessed <https://www.aemc.gov.au/sites/default/files/2019-09/Draft%20report%20-%20Compliance%20template%20review%20-%20FOR%20PUBLICATION.pdf>

Thank you for the opportunity to comment on this consultation and for inviting our members to participate in the technical reference panel. If you would like to discuss any of the issues raised in this submission, please contact Tom Parkinson, Policy Officer, on (03) 9929 4156 or tparkinson@cleanenergycouncil.org.au or myself, as outlined below.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lillian Patterson', written in a cursive style.

Lillian Patterson
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