

18 October 2019

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submitted by email to aemc@aemc.gov.au

Project number: REL0070

Generator compliance template review - 2019 Draft report

Snowy Hydro Limited welcomes the opportunity to comment on matters raised in the Draft report from the Australian Energy Market Commission (the Commission) on the Generator compliance template review.

Snowy Hydro Limited is a producer, supplier, trader and retailer of energy in the National Electricity Market ('NEM') and a leading provider of risk management financial hedge contracts. We are an integrated energy company with more than 5,500 megawatts (MW) of generating capacity. We are one of Australia's largest renewable generators, the third largest generator by capacity and the fourth largest retailer in the NEM through our award-winning retail energy companies - Red Energy and Lumo Energy.

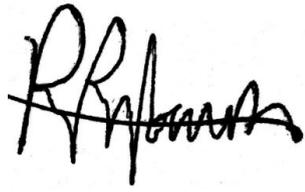
Snowy Hydro engaged with GHD Pty Ltd (GHD) to support the review by identifying options and making recommendations for changes to the template to address the review's scope. In respect to the changes and alterations proposed, we are largely comfortable with what is proposed. We do however require further clarity on Section 3.1.1 - S5.2.5.5 in respect to what the new proposed template notes.

This template review seeks to identify a process for how to assess fault ride through and makes alterations to method 3a. Namely; the assessment of results obtained from high speed recorders recording performance during a major event/major disturbance/significant disturbance. As a supplementary GHD/AEMC Reliability Panel also look to provide a definition of what constitutes a major event/major disturbance/significant disturbance.

The complication for Snowy Hydro is that unless either Australian Energy Market Operator (AEMO) or the Transmission Network Service Provider (TNSP) advise market participants of when such an event occurs then they are unable to know when to assess. The template proposes market participants must test performance within 3 years which means it would require that the market participant search for an event to assess. Snowy Hydro remains unclear on how the assessment will be undertaken to periodically assess against multiple fault ride through and requires some certainty on this process.

Snowy Hydro appreciates the opportunity to respond to the Draft report and any questions about this submission should be addressed to me by e-mail to panos.priftakis@snowyhydro.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Priftakis', with a horizontal line drawn through the middle of the letters.

Panos Priftakis
Head of Wholesale Regulation
Snowy Hydro

