

17 October 2019

Mr Charles Popple
Chairman
Reliability Panel
PO BOX A2449
Sydney South NSW 1235

Via online submission

Dear Mr Popple,

RE REL0070 – GENERATOR COMPLIANCE TEMPLATE REVIEW

TasNetworks welcomes the opportunity to make a submission to the Reliability Panel's (**RP's**) review of the Generator Compliance Template (**GCT**).

As the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner (**JP**) in Tasmania, TasNetworks is focused on delivering safe and reliable electricity network services while achieving the lowest sustainable prices for Tasmanian customers. This requires the prudent, safe and efficient management and development of the Tasmanian power system. TasNetworks is therefore supportive of the RP's efforts to improve the technical and informational aspects of the GCT.

In general, TasNetworks considers the changes proposed to the GCT are relevant and appropriate. TasNetworks offers the following comments on specific aspects of the GCT to inform the RP's further deliberations.

Defined Terms

TasNetworks supports the removal of the excess stipulation surrounding the definition of plant change and considers this will avoid unnecessary confusion with this term. In contrast, and although agreeing with the rationale for changes to the interruption definitions such as 'major event', TasNetworks considers they are not totally clear and could be open to interpretation. TasNetworks suggests further detail be included in these definitions and/or be supplemented with further examples and context in the final report. This is to avoid any irregularity in application once the GCT is finalised.

Monitoring

TasNetworks considers that further detail is required with regard to High Speed Monitoring (**HSM**). For example, what constitutes the minimum HSM requirement. In this respect, TasNetworks agrees with other commentators that development of a HSM standard would be beneficial. As would a

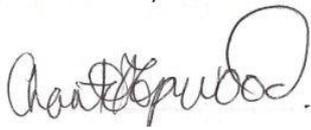
provision for generators to provide any HSM data to NSPs for compliance and model validation purposes. The risk is without such standardised information appropriate and accurate monitoring of in-service performance is compromised.

Formatting

TasNetworks considers that table formatting might be changed to improve readability and clarity. At present, many table elements are combined in single row entries. Splitting out different elements into separate rows would seem a better approach for avoiding confusion.

TasNetworks would welcome the opportunity to discuss this submission further with you. Should you have any questions, please contact George Ivkovic, Network Performance Team Leader, via email (george.ivkovic@tasnetworks.com.au) or by phone on (03) 6271 6534.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Chantal Hopwood". The signature is fluid and cursive, with a large loop at the end.

Chantal Hopwood,
Leader Regulation