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14 December 2009

Dr John Tamblyn  
Chairman, Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Dear Dr Tamblyn

**Consultation Paper**  
**National Electricity Amendment (Transparency of Operating Date) Rule 2009**  
**Reference: ERC0096**

The NGF welcomes the opportunity to comment on the National Electricity Amendment (Transparency of Operating Data) Rule 2009.

The NGF supports this Rule change because it:

- Provides more operating data information to the market;
- Increases market transparency and promotes a more informed market response to unplanned generation events; and
- Alleviates the market advantage that some market participants gain by purchasing power line flow and data in dispatch time by private companies.

**NGF understanding of Rule change**

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The NGF understands that the modifications to the Rules as a result of this Rule change will result in:

- Actual generation for each non scheduled generating unit and non scheduled generating system
- Actual generation for each scheduled generating unit and semi scheduled generating unit
- Actual network service for each scheduled network service
- Actual load for each scheduled load

being published by AEMO in each trading interval in dispatch time.

As a result of the way in which the Rules will be modified, AEMO will still be required to publish the data on:

- Dispatched generation for scheduled generating unit and semi scheduled generating unit
- Dispatched network service for each scheduled network service
- Dispatched load for each scheduled load

on the next trading day (D+1).

However, it will no longer be required to publish data on:

- Actual generation for each non scheduled generating unit and non scheduled generating system
- Actual generation for each scheduled generating unit and semi scheduled generating unit

on the next trading day (D+1).

### **NGF position**

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The NGF believes there should be an unambiguous obligation for AEMO to publish information relating to:

- Actual generation for each non scheduled generating unit and non scheduled generating system
- Actual generation for each scheduled generating unit and semi scheduled generating unit
- Actual network service for each scheduled network service
- Actual load for each scheduled load

by AEMO in each trading interval in dispatch time.

We support this because:

- Whilst clause 3.13.1 (a) states that AEMO must make available to scheduled generators, semi scheduled generators and market participants on request any information concerning the market which is not confidential, we still believe that the requirement to publish this NEM operating data on the next day- as opposed to in dispatch time, represents a prohibition against publishing it earlier.
- Publishing operating data in dispatch time on the same day is a significant change from the current market information publication schedule.

On this basis, we believe that an unambiguous rule change proposal is required for AEMO to accelerate the publication of this information to the market.

Please feel free to contact Mr. Con Noutso Manager Regulation (Access) at TRUenergy on Tel: 03 8628-1240 for further inquiries regarding this submission.

Yours sincerely



Malcolm Roberts  
Executive Director