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Submitted online to: <http://www.aemc.gov.au/Rule-Changes/Managing-power-system-fault-levels>

**Managing power system fault levels Rule Change**  
**Reference: ERC0211**

EDL is a national and global supplier of safe, clean, low greenhouse gas emissions energy, remote energy solutions and renewables, with a range of facilities in Australia, including our global headquarters in Brisbane. EDL owns and operates 759 MW of installed power generation capacity in Australia and over 950 MW globally.

EDL's NEM connected generation mostly uses a range of intermittent fuel sources such as landfill gas, waste coal mine gas and wind. Having operated in the NEM since its inception, we are experienced in the generator connection and registration process.

EDL notes that obligations to do no harm are already dealt with in the National Electricity Rules. We note the requirements of clause 5.3.5(d). We submit that where an existing project or project under development has reached an offer to connect or connection agreement that there be no further requirement to undertake any works not already set out in the offer to connect or in the connection agreement.

With respect to connecting generators in the period after the proposed rule change takes place on 1 July 2018, we note that the Commission proposes that an NSP includes the minimum 'expected fault current' at the proposed connection point in a connection inquiry response. EDL supports the CEC's position that it is reasonable to expect that this information is supported by the assumptions which have led to the minimum fault current. Providing the assumptions will enable a generator to better understand the risks associated with the proposed connection point.

EDL also supports the CEC response to the proposed rule introduction regarding the system strength remediation scheme. Broadening the rule to permit a contract with a third party to provide fault current will, in EDL's view, provide benefits to both the Connection Applicant as well as the Network.

Yours sincerely



**Tim Sprey**

Head of Growth, Renewables and Head of Regulatory Affairs  
Energy Developments Pty Ltd