

30 April 2012

Reliability Panel
Australian Energy Market Commission
Level 5, 201 Elizabeth Street
Sydney NSW, 2000
Australia

PO Box A2449
SYDNEY SOUTH NSW 1235

Online lodgement: REL0047 at <http://www.aemc.gov.au>

DRAFT REPORT – Template for Generator Compliance Programs – 28 March 2012

Delta Electricity welcomes the opportunity to comment to the Australian Energy Market Commission's (AEMC) "DRAFT REPORT - Template for Generator Compliance Programs – 28 March 2012".

Delta Electricity makes the following comments on the Draft Report, specifically the issues raised in Section 3;

1. **Changes to the Rules or the Performance Standards** – Delta accepts that the time to comment on this issue may have passed but suggests the AEMO also review Clause 5.3.9 alteration process and ensure a participant's proposed alteration to plant is appropriately considered by all the relevant participants. Some guidance is required in the Template as to the need for parties to renegotiate relevant standards affected by any alteration, with consideration of the latest version of the Rules, and the subsequent need for the generator to reconsider the program activities for the altered technology and standards.
2. **Frequency of Tests** – Delta Electricity accepts the findings of the Panel regarding this issue and offers comment below for consideration in any future review.
3. **Different Generator Technologies** – Delta Electricity accepts the findings of the Panel regarding this issue.
4. **Timing to Implement Compliance Programs** – Delta Electricity suggests that the Panel considers performing a future and separate review of the process of commissioning power stations and the impact and expectations of participants for registered Performance Standards. The experience Delta Electricity has with the initial development of performance standards, including capturing of compliance evidence and the subsequent development of compliance programs, may require modification of the template.

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Comment from Delta Electricity April 2012

5. **Other Minor Amendments** – Delta Electricity accepts the findings of the Panel regarding this issue and offers in the attachment some further suggested changes to improve clarity including for:
- a. further suggested changes to the Template (Attachment 1 contains some further suggested additions but the existing suggested changes made by the Reliability Panel/AEMC were accepted to better identify the changes Delta now suggests); and
 - b. improvement of the ease of reading and using the template. A suggestion to separate the guidance for standards across pages for better clarity and for the Template to be provided in various formats and forms for use by Generators. (attachment 2)

Specific Comment on the Item 2 “Frequency of testing”

Delta Electricity notes the viewpoints of the Reliability Panel and other participants in the draft report but offers the view that, although the template should support flexibility, ultimately the template becomes an indication of what a participant can interpret to mean “good electricity industry practice” for the program. To avoid issues where, for example, one participant chooses a philosophy of testing every 15 years whilst another, with similar equipment, adopts an approach of say 4 yearly testing, it is suggested a maximum period be included.

Please do not hesitate to contact Simon Bolt Production NEL Compliance Officer on (02) 63528 649, for clarification of Delta’s comments.

Yours sincerely,



Anthony Callan
General Manager Marketing

Attachment 1 – Template Table Suggested further amendments

Attachment 2 – Suggested Format change to better display each individual standard and guidance.