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Dr John Tamblyn  
Chairman  
Australian Energy Market Commission  
PO Box H166  
Australia Square NSW 1215

Dear Dr Tamblyn

**Proposed Rule No. 2005/1  
Timely information to NEMMCO after operating incidents**

Thank you for the opportunity to comment on the proposed rule change submitted to NECA on 19 April 2005 by NEMMCO.

The National Generators Forum (NGF) supports the need for NEMMCO to have timely access to relevant information following a system incident or operating condition deviation to enable NEMMCO carry out analysis and reporting.

The NGF agrees with the proposed 20 business day timeframe for the submission of information relating to the performance of equipment during and after an incident, as drafted in clause 4.8.15(d1).

However, the NGF believes that any information requested by NEMMCO by the proposed 20 business day deadline must be limited to that reasonably available to the Registered Participant within that timeframe. This may include information such as:

- Events leading up to the incident;
- The response of equipment during the incident;
- Records of generating unit power, reactive power, voltage, current and frequency that would reasonably be expected to have been recorded.

In some circumstances, it may not be possible for the Registered Participant to furnish detailed analysis or findings regarding the cause of a plant failure or performance deviation within 20 business days. In these cases, the NGF believes that it would be necessary for NEMMCO and the Registered Participant to agree to a timetable for furnishing the additional information required by NEMMCO.

Therefore the NGF proposes the following process for dealing with NEMMCO's information requirements under clause 4.8.15:

- All available information required by NEMMCO under clause 4.8.15(d) would be provided to NEMMCO within 20 business days to enable NEMMCO to produce its preliminary and/or final report;
- Where there are uncertainties, inconsistencies or a lack of complete information, then NEMMCO would be advised of the information gaps, the proposed means to obtain the required information (e.g. plant testing, analysis, expert review) and the timeframe in which the information would be furnished to NEMMCO.

If you have any questions arising from this submission, please contact the undersigned on (02) 6243 5120.

Yours faithfully

Sgd M Mackintosh for  
JOHN BOSHER  
EXECUTIVE DIRECTOR  
NATIONAL GENERATORS FORUM