



7 November 2013

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Submission lodged online at: www.aemc.gov.au
Project Number: ERC0151

**Submission to: Authorisation of Software Changes by AEMO –
Objection to expedited rule making process**

The NGF is the national industry association representing private and government owned electricity generators. NGF members operate all generation technologies, including coal-fired plant, gas-fired plant, solar, hydroelectric plant and wind farms. Members have businesses in all States and Territories.

The NGF disagrees with the request for an expedited rule making process.

We commend the AER's intent to improve the efficiencies in the current process by removing its involvement from a process that it has not actively participated in for several years. However, as outlined in the AEMC's consultation paper there are sufficient ambiguities in the current IT change process to warrant a normal rule change process to adequately assess the implications for operating in the national electricity market.

The existing arrangements between the AER and AEMO for approving IT software changes appears to be dependent on complying with the AEMO IT Change Management Procedures Manual. It is not clear, however, what requirements are considered in developing or amending the Manual or how the proposed dispute resolution process may be applied to software changes.

The NGF appreciates the opportunity to respond to this consultation paper. Please contact me on (02) 6232 7789 if you would like to discuss any issue associated with this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Reardon', written in a cursive style.

Tim Reardon
Executive Director