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Reliability Panel  
 Australian Energy Market Commission  
 Level 5, 201 Elizabeth Street  
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**Template for Generator Compliance Programs**

TRUenergy welcomes the opportunity to provide comments on the Reliability Panel’s “Issues Paper: Template for Generator Compliance Programs”.

TRUenergy owns and operates a diverse range of generators in the NEM. In place is a formal quality management system that follows the principles of ISO9001:2008 Quality Management Systems that specifically includes standard operating procedures to ensure electricity regulatory compliance. The compliance and audit program covers the generator performance requirements as per the National Electricity Rules as well as compliance under other relevant legislation and jurisdictional license requirements. The information provided in the Generator Compliance Template is used to formulate the more detailed Operating Procedures, as indicated in diagram and text box on page four of the Template for Generator Compliance Programs

A structured audit program is in place to ensure procedures are audited at a minimum of three-yearly and in some cases more frequently depending on changes to generation plant or amendment of elements of the quality management system. Management have the opportunity to respond to audit findings and actions to improve compliance are agreed.

1. The Panel welcomes any comments on whether any changes to the Rules have impacted the template.	TRUenergy is not aware of any Rule Changes that have impacted the template.
2. What changes to technology have occurred (if any) which should be reflected in the template?	TRUenergy considers that the template addresses the main forms of generation technology in the NEM; however some consideration to the emergence of large scale solar may be warranted in due course.
3. The Panel welcomes any comments on whether any changes to the performance standards have impacted the template.	TRUenergy is not aware of any changes in performance standards that have impacted the template.
4. What have stakeholder's experiences been with the template? Are there any suggestions to improve or clarify the template?	Minor suggestions to improve clarity include (a) Where this exists a part (a) and part (b) for a testing method, the use of “; and” after part (a) is recommended to ensure that both parts are used.

	<p>The current layout can give rise to ambiguity with the consequence that only one part is used.</p> <p>(b) Where Rule provisions and their precedents are quoted list them in reverse chronology order to improve clarity.</p> <p>Example: "Response to Voltage Disturbances (as required under: S5.2.5.3 in versions 1-12 of the Rules, and S5.2.5.4 in versions 13-30 of the Rules; and S5.2.5.3 in the initial Code, and all amended versions of the Code)"</p> <p>amend to</p> <p>"Response to Voltage Disturbances (as required under: S5.2.5.4 in versions 13-30 of the Rules, and S5.2.5.3 in versions 1-12 of the Rules and; and S5.2.5.3 in the initial Code, and all amended versions of the Code)"</p>
<p>5. What other factors, including outcomes of market incidents should be considered to further clarify and improve the template?</p>	<p>TRUenergy has no suggestions to make in regards to this question.</p>

Finally TRUenergy thanks the Reliability Panel for the opportunity to provide a submission on the issue of Generator Compliance Programs templates. We note that to provide an effective and reliable power system all participants have a significant role in ensuring compliance with relevant performance standards. Please feel free to contact me on (03) 8628 1632 should you wish to further discuss this submission.

Yours Sincerely,



Lana Stockman  
 Manager, Wholesale Regulation  
 TRUenergy