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Your Ref: ERC0204
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13 May 2016

Mr John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235

Dear Mr Pierce

Submission to the proposed National Electricity Amendment (Registration of proponents of new types of generation) Rule 2016


We welcome the opportunity to make the following submission on the Rule change proposal to amend the definition of 'generating unit' in the National Electricity Rules (NER), requested by the Australian Energy Market Operator (the **AEMO proposal**).

We support AEMO's proposal to amend the definition of 'generating unit' in Part 10 of the NER to provide greater clarity by recognising and including generation technologies other than those related only to the conversion of mechanical energy to electricity and to include emerging new technologies such as storage, fuel cells and non-mechanical systems.

We also support AEMO's suggestion that subsequent to the amendment review of the definition (if approved by your Commission) that it would be appropriate to inform any potential changes to performance standards with operational experience.

Please contact Mr Craig Oakeshott on (08) 8213 3469, if you would like to discuss any aspect of this submission.

Yours sincerely



Peter Adams
General Manager - Wholesale Markets branch