

24 November 2006

Dr. John Tamblyn
Chairman
Australian Energy Market Commission
Level 16, 1 Margaret Street
SYDNEY NSW 2000

Letter sent electronically to: submissions@aemc.gov.au

Dear Dr. Tamblyn,

**Comments on the AEMC Draft Rule Determination
Technical Standards for Wind and other Generator Connections Rule 2006**

Thank you for the opportunity to comment on the Draft Rule Determination. Snowy Hydro supports the National Generators Forum in its efforts to gather and submit comments on behalf of all forum members however Snowy Hydro wishes to make an additional and specific comment on one aspect of the Draft Rule Determination.

In relation to Draft Rule S5.2.5.8:

Snowy Hydro notes that the minimum access standard specified in Draft Rule S5.2.5.8 (a) (2) (i) (A) or S5.2.5.8 (a) (2) (ii) cannot be met by our hydro units and possibly not by our gas turbine plant. The main concern is being able to comply within the 3 second timeframe stipulated as the minimum response time. Snowy Hydro considers that compliance with the minimum access standard will only be possible via S5.2.5.8 (a) (2) (1) (B) which requires disconnection (tripping) of plant within one second.

It is anticipated that if required to implement this facility Snowy Hydro will utilise an over-frequency protection trip, to be triggered at the frequency level and duration as nominated by NEMMCO.

Snowy Hydro makes the following comments:

1. Snowy Hydro does not support tripping of its generation plant as a method of controlling system over-frequency and considers this to be contrary to the principle of continuous uninterrupted operation as contemplated by the automatic access standard in S5.2.5.3.
2. Further, under S5.2.5.8 NEMMCO may nominate a frequency and duration for disconnection which conflicts with a performance standard established under S5.2.5.3 and tripping under S5.2.5.8 (e) is "notwithstanding S5.2.5.3". In this circumstance the objective of the minimum access standard and the legal position of the Generator is clearly compromised.
3. There is already another access standard (S5.2.5.11) which is directed specifically towards frequency control. Snowy Hydro questions whether the clarity of objective (system security) is achieved by multiple definition of the same objective across different access standards.

Snowy Hydro considers the matters above to be material and that similar inconsistency may exist in other areas of the access standards definitions.

Snowy Hydro therefore supports the NGF's request that further broad based review of the technical standards be undertaken before they are adopted for other generation connections, and that interim modifications to the technical standards, as required specifically for wind generation, be implemented to meet the immediate need for this specific technology.

Snowy Hydro would also consider it appropriate to include a review of the process for establishing connection, and the obligations of all Parties involved in processing the connection application and developing the performance standards as these factors can both have a direct impact on the 'quality' of the performance standard established, particularly under the revisions to the technical standards contemplated by the Draft Rule Determination.

If you have any questions in relation to this letter please do not hesitate to contact me on 02 6453 2446.

Yours sincerely

(By email correspondence)

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