



21 September 2012

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged via AEMC website

Dear Commissioners,

ERC0148 – Changes to normal voltage

Alinta Energy welcomes the opportunity to make a submission in response to the Australian Energy Market Commission's (AEMC) consultation paper on the National Electricity Amendment (Changes to normal voltage) Rule 2012, proposed by International Power.

Alinta Energy suggests that the impact of future changes to normal voltage represent an unknown but possibly significant outcome in any one instance. The cumulative impact could be marginal and thus clarification of clause 5.3, while possibly an inelegant solution, is a proportionate response. Clarification around consultation requirements ensures any potential administrative, capital and operational costs are appropriately considered.

While there may be appropriate reasons for a network voltage level change and market participants overall may benefit from such a change, the rules need to be explicit about the rights of such impacted participants and clearly define the obligations on the Network Service Provider.

While an affected participant might expect a Network Service Provider to consult to achieve the best outcome, there is nothing explicit in the rules obliging the Network Service Provider to act to fully address legitimate concerns. In fact, the Network Service Provider might tend to resort to a "best endeavours" approach irrespective of any objection from an affected participant or impact on the participant's operations.

The proposal would not prevent such changes where it was of benefit, but would ensure that the associated processes included an appropriate and interactive consultation process with the impacted participant(s), plus Alinta Energy would suggest the acceptance by the Network Service Provider of all reasonable costs imposed on the participant as a result of the change. This could possibly include changes to equipment, protection settings, modelling costs, and (because the participant has to make plant changes) any additional costs associated with any adjustment of connection performance standards.

Should you have any queries in relation to the Alinta Energy submission, or wish to discuss these matters more generally, please do not hesitate to contact me on, telephone, 02 9372 2633.

Yours sincerely,

Jamie Lowe
Manager, Market Regulation