



25 May, 2005

Peter Adams  
NECA  
*By email:* padams@neca.com.au

Dear Peter,

**Submission on the Information publication for non-scheduled generation**

SPI (South Australia) Pty Ltd ("TXU") appreciates the opportunity to comment on the proposed code change in relation to the publication of non-scheduled generation data.

We broadly support the code changes submitted by NEMMCO, and believe the intent of the changes enjoy broad industry support across a range of market participant classes. However we believe wording changes are required to make sure the changes deliver the full benefits that are possible.

The NGF has separately submitted a series of amendments to the NEMMCO proposal, which we support. These amendments aim to:

- Maintain the integrity of the MT Pasa forecasting process, by retaining the requirement for NEMMCO to publish the "most probable" demand forecast;
- Provide for the publication of forecast aggregate non-scheduled generation targeted each dispatch interval, and;
- Widen the scope of NEMMCO's proposed clauses to allow for the publication of all non-scheduled generator data available to NEMMCO, rather than restricting publication to non-scheduled generating systems greater than 30MW.

We recommend that NECA incorporates the code changes documented in the NGF submission, and expedites the implementation of these important code changes.

I would be happy to discuss our recommendations if clarification is required. For any enquires, please call me on (03) 8628 1130.

Yours truly,

Mark Frewin  
Regulatory Manager