



NGF Sponsored Rule changes Generator Compliance plans

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National Generators Forum

National Generators Forum

- Directly represents 21 major power generators in the NEM, 2 associates.
- Installed capacity 45,000 MW.
- Asset value about \$40 billion.
- Annual sales over \$11.9B/y.
- Over 95% of Australian market.
- www.ngf.com.au



Issues

- Technical standards for plants that existed when the performance standards was established – 95%
- Risks associated with compliance with performance standards – assurance and enforcement – 1st change
- Provisions for information for planning new plant – 2nd Change
- Technical standards scope and drafting
 - NECA review
 - NEMMCO wind technical standards Rule change
 - Reliability Panel review
- Registration process & info requirements - new

Changes to performance standards

- Need ability to change standards
 - Not correctly recorded or incorrect
- Issue known at market start – Rule 5.3.8
 - No process for correction
- Included in Wind Technical Standards change
 - Removed by the AEMC
- Supported by generators, TNSPs and NEMMCO

Compliance Plans Rule change

- Arose out of parallel processes – NGF & MCE
 - Essentially consistent with the report by the AEMC to the MCE
 - Proposal to shift to a QA approach, voluntary compliance and AER audits
 - Reliability panel rather than AER
- Drafting by NGF, SCO & NEMMCO
 - Final edit by NGF
- Some drafting improvements
 - Conformance rather than breach
 - 4.15(b)

Issues - NEMMCO

- Cost recovery under 4.14 - agree
- Requirement for annual reviews – not necessary
- Reviewable operating incident – where NEMMCO performs a market review of an incident
- 4.15(f) – no notice, no report?
- Prefer to remove 5.7.3 but accept NEMMCO changes
- S5.2.4 – agree
- 8.8.1(a)(2b) – oversight, agree.

Issues - TNSPs

- Grid Australia
 - NSP access to compliance plan monitoring
 - NSPs on Reliability Panel and Working Group
 - NSP access the same as NEMMCO's,
 - 5.7.3 was intended to be removed
 - Others – oversight, agree with changes
- Vencorp
 - Involvement in guidelines – agreed
 - Localised standards – disagree
 - Access to information from TNSP – agreed

Other Issues

- Review of Technical Standards
 - Need to clearly link to system standards
 - No free provision of services
 - Improved drafting – AER and NGF view
 - Must address standards not just process
 - May be more urgent if SA does not allow negotiated standards
- Registration process
 - Provision of S5.2.4 information twice
 - Need to clearly separate connection and registration processes

The Bridge to the Future

