

NEMMCO

National Electricity Market
Management Company Ltd

ABN 94 072 010 327

Sydney Office

5 October 2007

Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
Australia Square NSW 1215
By Email

Dear Dr Tamblyn

Proposed National Electricity Amendment (Minor Changes) Rule 2007

Thankyou for the opportunity to make this submission on the AEMC's proposed Minor Changes Rule. NEMMCO has also identified a number of additional minor changes that the AEMC may wish to consider, which are in the attachment to this submission.

Should you have any further queries, please contact Brian Nelson on 02 9239 9132.

Yours faithfully



Brian Nelson
Head of Regulatory Affairs and Compliance

Attach.

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ATTACHMENT

Clause	Existing	Should be...
3.2.1(c)(2)	market	<i>market</i>
3.3.8(c)	The <i>prudential margin</i> for a <i>Market Participant</i> is a dollar amount to be determined by <i>NEMMCO</i> applying the principles set out in schedule 3.3, being amount...	The <i>prudential margin</i> for a <i>Market Participant</i> is a dollar amount to be determined by <i>NEMMCO</i> applying the principles set out in schedule 3.3, being <u>an</u> amount...
3.8.24(a)	scheduling error	<i>scheduling error</i>
3.8.24(b)	Spot prices	<i>Spot prices</i>
3.8.24(b)	market ancillary service prices	<i>market ancillary service prices</i>
3.8.24(b)	scheduling error (occurs twice)	<i>scheduling error</i>
3.9.2B(a)	constraint	<i>constraint</i>
3.9.2B(g)	publish	<i>publish</i>
3.11.3(b)(2)	direction	<i>direction</i>
3.11.4A(a) ¹	The objective for <i>system restart ancillary services</i> is to minimise the expected economic costs to the <i>market</i> in the long term and in the short term, of a <i>major supply disruption</i> , taking into account the cost of supplying <i>system restart ancillary services</i> , consistent with the <i>NEM objective</i> (the SRAS objective).	The objective for <i>system restart ancillary services</i> is to minimise the expected economic costs to the market in the long term and in the short term, of a <i>major supply disruption</i> , taking into account the cost <u>to the market</u> of supplying <i>system restart ancillary services</i> <u>in the short term and the long term</u> , consistent with the <i>NEM objective</i> (the SRAS objective).
3.11.4(b)(2)	...increase benefits of trade...	...increase <u>in</u> benefits of trade...
3.11.4A(d)	<i>NEMMCO</i> must develop and <i>publish</i> a detailed description of each type of <i>system restart ancillary service</i> in accordance with the guidelines determined by the <i>Reliability Panel</i> under clause 8.8.3(aa)(3), which description must identify:	<i>NEMMCO</i> must develop and <i>publish</i> a detailed description of each type of <i>system restart ancillary service</i> in accordance with the guidelines determined by the <i>Reliability Panel</i> under clause 8.8.3(aa)(<u>4</u>), which description must identify:

¹ Note there is a discrepancy between the Rule and page 14 of the AEMC's Rule Determination on National Electricity Amendment (System Restart Ancillary Services and pricing under market suspension) Rule 2006. The suggested change brings the Rule into line with the determination.

Clause	Existing	Should be...
3.11.4B(b)	<i>NEMMCO</i> must determine the boundaries of the <i>electrical sub-networks</i> in accordance with the guidelines determined by the <i>Reliability Panel</i> under clause 8.8.3(aa)(4).	<i>NEMMCO</i> must determine the boundaries of the <i>electrical sub-networks</i> in accordance with the guidelines determined by the <i>Reliability Panel</i> under clause 8.8.3(aa)(<u>5</u>).
3.11.5(a)	Except as provided in 4.8.9,	Except as provided in <u>clause</u> 4.8.9,
3.11.5(m)	business days	<i>business days</i>
3.14.5(d)(2)	connected	<i>connected</i> (not sure if it should be italicised)
3.14.5(h)	published	<i>published</i>
3.14.5(m)	connected	<i>connected</i> (not sure if it should be italicised)
3.14.5(m)	<i>suspension node</i> (last line)	suspension node
3.15.6A(m)	cross reference to clause 3.15.6A(j)	cross reference to clause 3.15.6A(k)
4.8.12(d)	reference to <i>Market Network Service Provider</i>	<i>Network Service Provider</i>
4.9.1(a)	timetable	<i>timetable</i>
4.14(h)(3)	cross reference to clause 5.3.3	cross reference to clause 5.3.4A
5.6.6A(c)	publish	<i>publish</i>
5.6.6B(c)	publish	<i>publish</i>
5.7.7(a) - Chart 1 - Item 4	<i>network development</i>	<i>network development</i>
S5.2 throughout (and especially S5.2.5.12(a))	The <i>automatic access standard</i> is a <i>generating system</i> must have <i>plant capabilities</i> ...	The <i>automatic access standard</i> : a <i>generating system</i> must have <i>plant capabilities</i> ... (Note: grammatically the schedule is sometimes difficult to follow and may not be consistently applied throughout).
S5.2.2	If the <i>Network Service Provider</i> or, if the requirement is one that would involve	If the <i>Network Service Provider</i> or, if the requirement is one that would involve

Clause	Existing	Should be...
	<i>NEMMCO</i> under clause 5.3.4A(b) of the <i>Rules</i> ,	<i>NEMMCO</i> under clause 5.3.4A(b <u>c</u>) of the <i>Rules</i> ,
Schedule 5.3 (c)	performance standards	<i>performance standards</i>
8.8.3(aa)(1)	Objective	objective
8.8.3(aa)(5)	generation	<i>generation</i> (not sure if it should be italicised)
8.9	publish (several occurrences)	<i>publish</i>
8.10	publish (several occurrences)	<i>publish</i>
Chapter 10	Definition of Accredited Service Provider category: A category of registration of a <i>Metering Provider</i> established by <i>NEMMCO</i> under S7.4.2(b)...	A category of registration of a <i>Metering Provider</i> established by <i>NEMMCO</i> under <u>clause</u> S7.4.2(b)...
Chapter 10	Definition of suspended region region	<i>region</i>
11.2.1(b)(3)(i)	consistent with the requirements in clause 8.8.3(a); and	consistent with the requirements in clause 8.8.3(<u>aa</u>); and