

22 June 2009

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Mr Ian Woodward
Commissioner
Australian Energy Markets Commission
PO Box A2449
South Sydney NSW 1235

Dear Mr Woodward,

REL 0032 Template for Generating Unit Compliance Plans

Pacific Hydro welcomes the opportunity to comment on the draft report and apologises for providing a late submission. The report is well balanced and has covered the industry concerns. We have only a minor comment that could be addressed in finalising the template.

S.5.2.5.6 Quality of Electricity Generated

Method 2 should refer to an 'appropriate power quality meter' rather than an 'in-service high speed data recorder'. A power quality meter may be permanently or temporarily installed for such measurements and is required to establish and measure the harmonic, flicker or unbalance quantities.

As operating plant (that has not been altered) should have consistent power quality characteristics, the annual review basis is excessive. A report on power quality of 3 to 4 years would be more appropriate. A yearly report would increase compliance costs unnecessarily as such a report normally requires a specialist to analyse the data.

Yours sincerely

Prepared for electronic publication and bears no signature

K P Summers
Regulatory Compliance Manager