



Hydro Tasmania
the renewable energy business

12 August 2010

Mr John Pierce
Australian Energy Market Commission
Level 5
201 Elizabeth Street
Sydney NSW 2000

Submitted on-line via AEMC website

Dear Mr Pierce

Re : Release of Generator information by AEMO ERC0112

Hydro Tasmania would like to thank the Commission for the invitation to comment on the, AEMC Staff Consultation Paper, "Release of Generator Information by AEMO", ERC0112. Hydro Tasmania is also a party to submissions by the National Generators' Forum and the Clean Energy Council.

Hydro Tasmania is Australia's leading renewable energy business, serving electricity, renewable energy and water management markets. We generate hydropower in Tasmania and trade electricity derivative products and energy-related environmental products such as Renewable Energy Certificates in the Australian market.

During 2009 we acquired the Victorian electricity retailer, Momentum Energy Pty Ltd. Our range of joint ventures includes Roaring 40s Renewable Energy Pty Ltd which we hold with the CLP Group. At 30 June 2010, Roaring 40s owned three wind farms in Australia with several other developments approved or in planning processes across a number of Australian states.

Our consulting arm, with offices at Cambridge, Tasmania and in Melbourne, Brisbane, Adelaide and New Delhi, India, offers products and services within Australia and internationally. It focuses on the Asia-Pacific region, based on the expertise we have developed over our 100-year history in power schemes, water management, renewable energy developments and environmental management.

Support for Proposed Early Release of Data

Hydro Tasmania welcomes the Rule change proposal from Senergy Econnect Australia Pty Ltd to permit the Australian Energy Market Operator to disclose information required by market participants or intending participants, at an earlier stage than allowed by the current NEM rules, to assess the feasibility of connecting new plant.

We appreciate the tension between on the one hand, the early release of models and data to allow preliminary studies to be performed and on the other hand, the consequential uncertainty in the value of any system modelling or analysis based on this necessarily conceptual design data. We believe that as long as the data is made available with appropriate caveats, any subsequent usage would be at the user's risk.

We also do not believe that any commercial advantage would be lost by the publication of this data, as the planning application would have happened much earlier and provided an overview of the proposed installation. This planning application would alert any competitors to the proposal, well in advance of this proposed rules process.

Clearly any detailed studies performed on the basis of preliminary data may be inadequate as a basis for determining final actual system performance, especially if there are significant differences between the early data and the final registered data after plant commissioning. In spite of the above risk, there is often some insight to be gained through the use of simple analytical models to give a preliminary view, as long as the user of the model is aware that the results are preliminary.

The responsibility for the correct modelling of system performance to ensure security would remain with the TNSP and AEMO as dictated by the NEM Rules, but intending participants would be able to make their own judgements as to the extent of any analyses they wish to conduct at each stage of the process.

Consideration of an Even More Open Process

Although it may be considered beyond the scope of the present proposal, we see some merit in considering the adoption of an even more open process. We understand that this may be a step too far for the present consultation. However, we believe that, if we do move towards an environment where there are multiple new connection applications in close proximity to one another then, such a move, to a more open connection process, is a necessary step towards more efficient transmission network design.

Timing of first release

There are several options for the timing of information release:

- the status-quo of “the later of” in Clause 3.13.3(14);
- the proposed change to “earlier of”;
- the release of information to an intending participant could occur at the time of a formal connection application; or
- information could be provided to intending participants when they submit a connection enquiry to a TNSP.

Scope of information released

The information released by the TNSP could be restricted to:

- basic project concepts as detailed in connection enquiries;
- preliminary data such as that submitted with connection applications and used by the TNSP to assess the impact of proposed connections on system security;

- best available models and data relating to all other connecting parties in the vicinity of the proposed connection point - 'electrically adjacent projects' – with the complication of defining which projects are 'electrically adjacent".;

Confidentiality

The released data could be

- confidential and represent the minimum information required to carry out the study ie models embedded in the library and preliminary dynamic characteristics; or
- simply published, so that the information is generally available.

However, this range of options for the release of project data is the basis for a somewhat wider discussion than required to address the current Senegy Econnect Australia proposal. Consideration of the impact of restricting information is probably not urgent, until there is a large number of near simultaneous connection applications in specific geographic areas of the NEM.

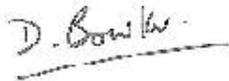
In closing, Hydro Tasmania would like to support the current proposal to allow the release of available data at the earlier of:

1. the execution of the connection agreement; or
2. three months before the proposed start of commissioning;

as long as it is made clear to users of the data that it is subject to changes.

If you require any further information, please contact me on (03) 6230 5775.

Yours sincerely,



David Bowker
Manager Regulatory Affairs
Hydro Tasmania