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COMMENTS IN RELATION TO THE DRAFT *NATIONAL ELECTRICITY RULES*

The Planning Council's submission relates primarily to the role and function of the Inter-Regional Planning Committee (IRPC), of which the Planning Council is a member.

As the market matures and the use of the national network increases, there is a need for recognition of the national impacts that local events and decisions may have. However, much of the detailed information and asset control still rests in State-based entities, creating a natural tension between the national nature of the market and the state-based ownership and management. In such an environment, the role of the IRPC has become more, not less, important as a vehicle for coordination across different States and different regional structures to ensure that consistent and reliable information is provided to the market operator and to market participants as a whole.

While the Planning Council accepts that there have been difficulties with both the legal and practical implementation of this coordination, there is still room in the *Rules* to allow such a coordination role to take place. The changes (or, more accurately, restitutions) suggested below, while not perhaps being easily legally enforceable, nevertheless provided a framework that enables the IRPC to encourage wider, cross-border information sharing and coordinated planning to occur.

5.6.3(A) FUNCTIONS OF THE IRPC

The draft *Rules* delete clauses 5.6.3(a)(1) and 5.6.3(a)(2) which are references to the IRPC assisting NEMMCO with the preparation of the Statement of Opportunities (SOO) and the Annual Interconnector Review.

5.6.5(e) contemplates NEMMCO seeking the assistance of the IRPC in the preparation of the ANTS and yet there is now no corresponding function under 5.6.3(a) to support this. While we endorse the

change to give prime responsibility for the preparation of both the ANTS and the SOO, there is still an important information sharing and coordination role that is undertaken by the IRPC. As such, we would suggest that the following changes be made to the *Rules*:

- Reinststate functions for the IRPC under 5.6.3(a) (1) and (2) with minor word changes such as:
(1) *Assist NEMMCO in the preparation of the Statement of Opportunities in accordance with clause 3.13.3(o2)*
(2) *Assist NEMMCO in the preparation of the ANTS in accordance with clause 5.6.5(e)*
- Reword 5.6.5(e) to read:
In carrying out the ANTS review, NEMMCO must consult with the Inter-regional Planning Committee.
- Insert a new clause 3.13.3(o2):
In preparing the Statement of Opportunities, NEMMCO must consult with the Inter-regional Planning Committee.

Additionally, the list of functions under 5.6.3(a) do not appear to be complete, missing other *Rules* functions of the IRPC such as those in 5.7.7 under inter-network power system tests.

INFORMATION PROVISION BY NETWORK SERVICE PROVIDERS

The *Rules* as drafted have deleted clause 5.2.3(d)(9), thus removing an obligation on NSPs to provide to NEMMCO and other NSPs all data available to it and reasonably required for modelling the static and dynamic performance of the power system. While the original clause referred to such modelling as required by the IRPC under the now defunct clause 5.6.5, removing the clause altogether will make NEMMCO's task of modelling static and dynamic performance much more difficult. Data for such modelling is still required and it would seem better to simply edit the clause to remove any reference to the IRPC rather than delete it altogether. The clause could therefore read:

5.2.3(d)(9) provide to NEMMCO and other Network Service Providers all data available to it and reasonably required for modelling the static and dynamic performance of the power system;

GUIDELINES FOR DETERMINING RELIABILITY AUGMENTATIONS

One of the remaining functions of the IRPC in the *Rules* under 5.6.3(a)(5) is to develop an objective set of criteria for assessing whether a proposed new small transmission network asset or new large transmission network asset is a reliability augmentation. This clause has been the source of some difficulty for the IRPC given that the Code and now the *Rules* already contains a complete definition of a reliability augmentation as:

A transmission network augmentation that is necessitated solely by inability to meet the minimum network performance requirements set out in schedule 5.1 or in relevant legislation, regulations or any statutory instrument of a participating jurisdiction.

Given the existence of such a definition it is questionable whether there is any value that the IRPC can add under 5.6.3(a)(5) and 5.6.3(l). The Planning Council would prefer to see the clause removed, or at least to see the language of 5.6.3(l) changed from "must" to "may."

I trust that the above comments are helpful and I would welcome the opportunity to discuss any of the matters raised with you or your staff.

Yours sincerely

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CORPORATE SECRETARY
(electronically submitted)