

SCO Response to Key Issues Raised by Stakeholders on the Second Exposure Draft of the National Electricity Rules, Released on 4 April 2005

Rule	Submission	SCO Response
Changes in substantive rights and regulatory obligations	A number of Code clauses have been deleted or amended in the Rules without equivalent provisions being included in the National Electricity Law (eg. cl 8.5.1, 8.5.4, 8.6.4, 8.7.3, 8.7.4). Such changes have resulted in reductions in the rights of participants, and an increase in the risks faced by participants, and should be subject to the new Rule change procedure.	SCO is satisfied that the reasons for the deletion or amendment of all Code clauses (including those specifically referred to) have been satisfactorily explained in the table of amendments issued with the first exposure draft of the Rules and in SCO's response to issues raised on the first exposure draft of the Rules. In particular, the policy position in relation to the sharing of information between regulators has been stated numerous times, including, most recently, in the Second Reading Speech for the National Electricity (South Australia) (New National Electricity Law) Amendment Bill 2005.
Reviews	The National Electricity Code includes a number of reviews that have been deleted in the Rules (eg. see Chapters 3, 4 and 6) and that should be retained, at least until the AEMC has reviewed the need for them and a consequent Rule change has been made removing the requirement to undertake the relevant review. This is particularly so as a number of these reviews relate to provisions that were considered to be interim or were part of the checks and balances of the design and operation of the market.	SCO is satisfied that the reasons for deleting the requirements for these reviews have been satisfactorily explained in the table of amendments issued with the first exposure draft of the Rules and in SCO's response to issues raised on the first exposure draft of the Rules.

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Overarching market objective	Is the purpose or object of the new National Electricity Law different from the national electricity market objective set out in section 7 of that Law?	The national electricity market objective is only of particular legal relevance in those provisions of the Law and the Rules that refer to it (eg. the Rule making test applied by the AEMC under s.88 of the new National Electricity Law).
Information gathering powers	The Rules should be amended to provide that the information gathering powers in sections 21 and 28 of the new National Electricity Law are only to apply as a "reserve power" where they relate to the AER's economic regulatory functions.	As SCO has stated in response to issues raised on the first exposure draft of the Rules, it is expected that, in the course of exercising its economic regulatory functions, the AER will generally proceed under clauses 6.2.5 and 6.2.6, with the coercive information gathering powers in sections 21 and 28 being reserve powers only. This remains SCO's expectation. However, the Rules cannot fetter these statutory powers and so it is not appropriate to make the suggested amendment.
Access	The issue of access to electricity networks needs to be settled so that any necessary changes can be accommodated in the Rules (and/or the National Electricity Law), it being necessary to protect the networks from declaration applications under Part IIIA of the Trade Practices Act. At a minimum, pass through provisions should be put in place to allow recovery of any costs incurred by network businesses as a direct result of the declaration risk.	Clauses 2.5.1(b), 5.2.3(a1) & (a2) and Schedules 5.8 & 5.9 have been deleted, and clauses 2.5.1(d)(2), 2.5.2(a)(2) and 5.2.3(a) have been amended, thereby removing the references to access undertakings. As the MCE has announced, it will consult on a national approach to energy access in the second half of this year.
Merits review	The issue of merits review needs to be addressed promptly in consultation with the industry.	As SCO stated in its response to issues raised on the first exposure draft of the Rules, the issue of merits review will be addressed in the context of the MCE's response to the Productivity Commission's Review of the National Gas Access Code. This will be consulted on in the second half of this year.

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1.7.1	The application of clause 20 of Schedule 2 to the new National Electricity Law means that transmission or distribution pricing determinations may be revoked or amended other than as provided in Chapter 6.	<p>Clause 1(2) of Schedule 2 to the new National Electricity Law allows the application of most of the provisions of Schedule 2 to the Rules to be displaced by a contrary intention in the Rules. While it is not appropriate to include clause 1(2) in the list of applicable provisions contained in clause 1.7.1 of the Rules, clause 1.7.1 is to the same effect as it provides that the listed clauses apply "unless the context otherwise requires". Moreover, clause 1(2) continues to have operation in relation to the Rules as a provision of the Law. In either case there is a clear contrary context or intention in the case of clauses 6.2.4(d) and 6.10.5(e) because:</p> <ul style="list-style-type: none"> • in the case of revocation, clauses 6.2.4(d) and 6.10.5(e) list the "only" circumstances in which a revenue or regulatory cap determination may be revoked; and • in the case of amendment, clauses 6.2.4(e) and 6.10.5(f) provide that, on revocation of such a determination, a new determination may be substituted – in other words, revocation and substitution is the means of amending such a determination, and the conditions for revocation for these purposes are exhaustively set out in the Rules.
2.5.1(a)	-	The redundant cross-reference to clause 2.5.1(c) has been deleted.

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2.5.1(d), (e), (e1)	The AEMC (not the AER) should be responsible for exempting persons from registering as Network Service Providers and for developing the associated guidelines.	SCO has already given its reasons for rejecting this submission in its response to issues raised on the first exposure draft of the Rules.
2.5.2(c)	The AER should not be responsible for determining whether a network service that has ceased to be classified as a market network service should be a prescribed service.	SCO has already given its reasons for rejecting this submission in its response to issues raised on the first exposure draft of the Rules.
2.11.3(b)(6)	-	A new clause has been inserted requiring that NEMMCO's annual budget must take into account its obligation to provide funds to the AEMC so as to enable the AEMC to provide the Advocacy Panel with its funding requirements for the financial year ending 30 June 2006 (see clause 8.10.3(c1)).
Chapter 3 - General inclusion of references to Scheduled Generators	These clauses should be amended (as appropriate) to exclude retailers.	The change made in the Rules has been to add references to Scheduled Generators. If retailers are subject to these clauses it is only because the current Code clauses already refer to Market Participants. The Rules have not altered this position. Any change to this position should be pursued through the new Rule change procedure.
	Non-market scheduled load should also be included in these clauses.	The inclusion of non-market scheduled load in these provisions is a matter that is better pursued through the new Rule change procedure.

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3.7.2(d)	The requirement that medium term PASA inputs must represent current intentions and best estimates should be deleted.	This requirement was introduced as a result of submissions made on the first exposure draft of the Rules. However, given that it seems to be controversial, this requirement will not be included in the Rules but will be left to the new Rule change procedure should those advocating it wish to pursue it.
3.8.9(e)	-	A reference to Scheduled Generators has been added for consistency with the preceding paragraphs in clause 3.8.9.
3.9.4, 3.9.6	Recommendations by the Reliability Panel in relation to VoLL or market floor prices should automatically trigger the Rule change process because otherwise several parties might seek the same Rule change, or even different Rule changes, in relation to the recommended VoLL and market floor prices.	The new Rule change procedure is sufficiently flexible to allow a number of proposed Rule changes arising from a Reliability Panel recommendation to be considered in the same process.
3.9.6A(d)	-	The cross-reference to clause 3.9.6A(c)(2) has been replaced by a cross-reference to clause 3.9.6A(c) (as para (2) does not exist).

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3.11.7	-	The references to Scheduled Generators (which were inserted as part of preparing the exposure drafts of the National Electricity Rules) have been removed because only Market Participants may have generating units and market loads classified as ancillary service generating units and ancillary service loads respectively.
3.12.1(b)	The extension of NEMMCO's reserve contracts to 1 July 2006 should await the Reliability Panel's recommendation, and any such recommendation should trigger a Rule change.	The ACCC has granted authorisation of the extension of the reserve trader arrangements to 1 July 2006.
3.14.2(c)(3)	The consent of the AEMC (rather than the AER) should be required for a trading interval to be treated as an administered price period where it is preceded by such a period and is likely to be succeeded by such a period. This is because the AEMC has been allocated all other relevant functions relating to administered prices and to allocate this limited function to the AER runs the risk of inconsistency and unnecessary decision making.	This is a quasi-regulatory function, exercisable on an ad hoc basis, which is considered to be properly allocated to the AER.
3.14.6(a2), (e)(5)	-	The references to Scheduled Generators (which were inserted as part of preparing the exposure drafts of the National Electricity Rules) have been removed because only Market Participants may submit dispatch bids.

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3.14.6(a3)	-	The references to Scheduled Generators (which were inserted as part of preparing the exposure drafts of the National Electricity Rules) have been removed because only Market Participants may have generating units and market loads classified as ancillary service generating units and ancillary service loads respectively.
3.15.6(a)	-	The redundant cross-reference to 3.6.3(a1) has been deleted.
3.15.6A (na)	This provision erroneously requires consultation on the market factor values rather than on the procedures or methodology used to determine them.	Following advice from NEMMCO, the relevant provision (cl.3.15.6A(na)(ii)) has been deleted. Despite a submission stating to the contrary, it is noted that the inclusion of clause 3.15.6A(na) was referred to in SCO's response to issues raised on the first exposure draft of the Rules in the context of the relocation of clause 3.11.8(c) (without its expired transitional operation) to clause 3.15.6A.
3.15.7A(c)(1)(ii)(A)	-	The reference to "Market Non-Scheduled Generators" has been replaced by a reference to "Market Generators" because the former term is undefined. This does not alter the operation of the clause because Market Generators may be scheduled or non-scheduled and Scheduled Generators are separately referred to.
3.15.11A	-	The terms "IRFM uplift", "white hole money uplift" and "smelter reduction amounts" have been deleted as they are not used in the Rules.

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3.17.1	Decisions of the AER to authorise changes by NEMMCO to its market operations computer software should be reviewable decisions.	As SCO stated in its response to issues raised on the first exposure draft of the Rules, the issue of merits review will be addressed in the context of the MCE's response to the Productivity Commission's Review of the National Gas Access Code. This will be consulted on in the second half of this year.
4.2.2(c)	The fact that clause S5.1.12 does not require consultation with NEMMCO on current ratings does not justify the deletion of the requirement to consult in clause 4.2.2(c).	NEMMCO has advised that the deletion of the reference to consultation with NEMMCO is correct as it is not consulted on such matters and sees no reason to be consulted on them.

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4.3.3(a)	<p>Section 52 of the National Electricity Law empowers NEMMCO, in accordance with the Rules, to delegate a function or power conferred on it under the Rules.</p> <p>Clause 4.3.3(a)(1) of the Rules empowers NEMMCO to engage such agents as it considers appropriate to carry out on its behalf some or all of its rights, functions and obligations under Chapter 4 of the Rules. Clause 4.3.3(a)(1) is invalid because the Law does not authorise NEMMCO to appoint an agent to carry out its statutorily-conferred functions, but only to delegate the exercise of those functions.</p>	<p>In referring to "agents" clause 4.3.3(a)(1) of the National Electricity Code used the term in a broad sense as encompassing delegates, eg. clause 4.3.3(d) of the Code actually referred to System Operators (being such agents) as having had their relevant rights and obligations delegated to them. Moreover, the fact that clause 4.3.3(a)(1) refers to System Operators being engaged as agents of NEMMCO does not preclude NEMMCO from exercising its power under section 52 to delegate certain of its functions to them. To the extent considered necessary, the terms of engagement between NEMMCO and System Operators could make this distinction. However, in order to put this issue beyond doubt, clause 4.3.3(a)(1) has been amended to refer to NEMMCO engaging such agents or appointing such delegates as it considers appropriate, and subsequent references in clause 4.3.3 to agents have been amended to also refer to delegates. Similar changes have been made to clause 2.6(a)(1) and the definition of "System Operator" (Chapter 10).</p>
4.8.4(b)	-	<p>The trigger for a declaration of Lack of reserve level 1 has been amended to refer to there being insufficient <u>short term capacity</u> reserves rather than merely insufficient reserves. This amendment has been made on the advice of NEMMCO.</p>

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4.8.9(c), 4.8.9A	There is a conflict between clauses 4.8.9(c) and 4.8.9A (previous Code clause 8.4.9). Clause 4.8.9(c) should prevail.	It is not considered that there is any conflict. Unlike the National Electricity Code, clause 4.8.9A(a) only requires a Registered Participant to follow a direction with which it is required to comply. Clause 4.8.9(c) does not require a Registered Participant to comply with a direction if to do so would be a hazard to public safety, materially risk damaging equipment or contravene any other law.
4.8.9(a1)(1)	This clause should not apply to non-market non-scheduled generating units as (among other things) this will inappropriately trigger the what-if pricing and market compensation arrangements in Chapter 3.	This clause has been amended to apply to scheduled plant and <u>market</u> generating units (as the latter might be non-scheduled as well as scheduled).
4.10.2(c)	Delete the "or" between "connection agreement" and "ancillary services agreement" as this alters an inclusive list to an optional list.	The insertion of "or" was not considered to alter the list from an inclusive to an optional list but to merely result in the words "any applicable" qualifying both "connection agreement" and "ancillary services agreement". Nonetheless, this amendment has been reversed.
Chapter 5	A number of relevant provisions have been amended to narrow their application to transmission elements. Such changes should not be made pending the development of the full MCE transmission reform package.	As stated by SCO in its response to issues raised on the first exposure draft of the Rules, the amendments made in this respect are all considered to be appropriate and to reflect the intention of the relevant provisions. The full MCE transmission reform package will take into account these provisions.

Rule	Submission	SCO Response
Treatment of Connection Assets	The replacement of references to "network services" by "transmission services" and of references to "transmission networks" by "transmission systems" has the consequence that contestable connection assets are subject to revenue capping regulation (or some other form of regulation) unless the AER determines otherwise.	<p>Clause 6.2.3 of the National Electricity Code provides that:</p> <ul style="list-style-type: none"> • concerns over monopoly pricing in respect of transmission <u>networks</u> are to be addressed through the introduction of competition in the provision of transmission <u>services</u> (cl. 6.2.3(a)); • where pro-competitive reforms are not a practicable or adequate means of addressing the problems of monopoly pricing in respect of transmission <u>networks</u>, <u>revenue capping</u> regulation is to be applied (cl. 6.2.3(b)); and • the ACCC is responsible for determining whether sufficient competition exists to warrant the application of a regulatory approach that is more light handed than revenue capping (cl. 6.2.3(c)). <p>It is acknowledged that Chapter 6 contains a number of internal inconsistencies. However, the prevention of monopoly rent extraction by Transmission Network Service Providers is an important objective of Chapter 6 (see cl. 6.2.2(c)) and Chapter 6 is clearly intended to regulate the revenue earned by Transmission Network Service Providers from transmission systems (not just transmission networks). Moreover, the revenue cap applies to "prescribed transmission services" and the definition of prescribed transmission services contemplates that the revenue cap may apply to services provided by both transmission network assets and connection assets.</p>

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		<p>Accordingly, it is considered correct that connection services be potentially subject to the revenue cap, but that they be excluded from that cap by the AER if:</p> <ul style="list-style-type: none"> • there is sufficient competition that they do not need to be regulated at all; or • there is not sufficient competition that would warrant them being totally unregulated but some more light-handed form of regulation is nonetheless considered warranted. <p>This is reinforced by clause 6.2.4(f) which stipulates that revenue caps are only to apply services that are not reasonably expected to be offered on a contestable basis.</p>
5.2.3	Clause 5.2.3 needs to be numbered as such.	This has been done.
5.6.3, 5.6.5	NEMMCO should be obliged to use information submitted by TNSPs or, if it does not, disclose why it did not.	The ANTS-related changes to the Rules are the result of amendments developed as part of the transmission regulation work stream. Any further changes, whether developed through this work stream or otherwise, are properly addressed through the new Rule change procedure.
5.6.5A	The AEMC (not the AER) should promulgate the regulatory test.	SCO has already given its reasons for rejecting this submission in its response to issues raised on the first exposure draft of the Rules.

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6.2.1 and Ch.10	The provisions governing the application of the distribution pricing regime to a transmission network should not be changed – in particular, it should not be the role of the AER (as opposed to the investor with the AER's approval) to determine the appropriate asset classification.	Clause 6.2.1(d) has been amended to conform with clause 6.2.1(d) of the National Electricity Code by providing that the Transmission Network Service Provider may deem part of its network to be subject to distribution price regulation, subject to the agreement of the AER and the relevant Jurisdictional Regulator. This leaves the definition of "transmission network" in Chapter 10 contemplating that, as is the case under the Code, the AER may deem such part of the network to be part of a transmission network.
6.2.3	The AEMC should be involved in deciding whether sufficient competition exists to warrant the application of a more light handed regulatory approach than revenue capping.	SCO has already given its reasons for rejecting this submission in its response to issues raised on the first exposure draft of the Rules.
6.2.3(d)(4)(iii)	-	The redundant cross-reference to clause 6.2.3(d)(4)(ii) has been deleted.
6.2.4(a)	The inclusion of the cross-reference to clause 6.2.3 is opposed.	Clause 6.2.3(c) provides that, if sufficient competition exists, then the form of economic regulation to apply to transmission services is not revenue capping but a more light-handed regulatory approach. Clause 6.2.4(a) provides that the form of economic regulation to apply to transmission services is revenue capping. In order to reconcile the two requirements it is entirely appropriate that the latter requirement be subject to the former requirement.

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6.2.4(a) and definition of "CPI" (Chapter 10)	The definition of "CPI" should be retained as it is used, in its defined sense, in clause 6.2.4(a). This defined term is referenced in a substantial number of contracts.	The deletion of the definition of "CPI" in Chapter 10, and the use of the (undefined) term "CPI" in clauses 6.2.4(a) and 6.10.5(a), is deliberate. These clauses refer to the requisite economic regulation being of the "prospective CPI minus X form, or some incentive-based variant of the CPI minus X form". This is a description of a methodology and in this context it is inappropriate to refer to a March quarter CPI. Given that the Rules are susceptible of change, it is unwise for contracts to cross-refer to provisions of the Rules without including provisions that contemplate or accommodate a change in or to those cross-referenced provisions.
6.2.4(c)(2)	Clause 6.2.4(c)(2) is narrower than the National Electricity Law in that it does not require the AER to take into account the cost of complying with the full range of "regulatory obligations" referred to in section 16(2)(a) of the Law.	SCO acknowledges this and considers it a matter that should be addressed in the Rule changes contemplated by section 35 of the National Electricity Law. Indeed, section 35(3)(a) specifically requires the new rules to address the recovery of the efficient costs of complying with "regulatory obligations".
6.2.4(d)(3)	The AER should only be able to revoke a determination on the basis that there is a substantial change in ownership of network assets if the owner of the network assets agrees.	The consent of the owner of the network assets was not required under the National Electricity Code and any such change should be pursued under the new Rule change procedure.
6.10.5(d)(2)	Clause 6.10.5(d) should require the relevant Jurisdictional Regulator to take into account the cost of complying with the full range of regulatory obligations imposed on distribution network service providers.	This is a matter that should be pursued under the new Rule change procedure (eg. as part of any review of distribution price regulation).

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6.18A(c)	The amendment to this clause has not remedied the problem.	SCO considers that the problem with clause 6.18A(c) has been remedied by requiring the TUOS/DUOS disclosure statement to be provided within 30 days of receipt of the confirmation of the request (as opposed to within 30 days of the end of the period to which the TUOS/DUOS disclosure statement relates).
7.2A.1	The obligation to use the B2B e-Hub for B2B communications should not apply if bilateral agreements are in place.	This amendment is not considered appropriate as it was not included in the B2B e-Hub changes authorised by the ACCC. However it is noted that clause 7.2A.4(k) allows parties to agree to making B2B Communications other than as set out in the B2B Procedures and that (if considered appropriate) such procedures could also permit bilateral agreements to provide for B2B Communications other than through the B2B e-Hub.
7.2A.3(o)	The cross-reference to clause 7.2A.2(m) should be a cross-reference to clause 7.2A.2(n).	SCO agrees with the submission and the cross-reference has been corrected.
7.2A.5(a)(2)	A new clause should be inserted equivalent to that submitted by NECA to the ACCC on 11 April 2005 and relating to the transitional provisions of MSATS procedures.	SCO agrees with the submission and a new clause 7.2A.5(a)(2) similar to that proposed by NECA has been inserted.

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7.9.1(b1)	-	A new clause 7.9.1(b1) has been inserted on the advice of NEMMCO. This clause requires a person engaged by NEMMCO to provide agency data collection systems and agency metering databases (ie. a meter data agent) to meet and comply with the service level requirements and any other criteria that NEMMCO establishes from time to time in relation to those functions (including accreditation requirements).
Chapter 8	Formerly reviewable NECA decisions should be subject to the dispute resolution procedures and judicial review of AER/AEMC decisions is not a satisfactory substitute. Some reviewable decisions would be better subject to review by a technical review body.	The dispute resolution procedures under the National Electricity Code did not apply to reviewable decisions of NECA (see clause 8.2.1(h)(1)). Moreover, as SCO has stated in its response to issues raised on the first exposure draft of the Rules, the issue of merits/technical review of AER/AEMC decisions will be addressed in the context of the MCE's response to the Productivity Commission's Review of the National Gas Access Code. This will be consulted on in the second half of this year.
8.5.7	The extension of liability for breach of the Rules to individual employees, as affected by the new National Electricity Law, is opposed. This extension is assisted by the removal of clause 8.5.7 and so clause 8.5.7 should be reinstated.	The policy in this regard is as embodied in section 68 of the new National Electricity Law, ie. an employee may be liable for being involved in a breach of the Rules by a Registered Participant.
8.7.2	The AEMC (not the AER) should be responsible for establishing the procedures and standards relating to information and data received by the AER given that such procedures and standards will also be applicable to the AER.	It is considered appropriate that the AER should establish these procedures and standards because they are integral to the AER's monitoring functions.

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8.8.4	There should be a minimum of 6 months notice given of technical standard charges.	SCO has already given its reasons for rejecting this submission in its response to issues raised on the first exposure draft of the Rules.
8.10.3(a)	-	The requirement on the Advocacy Panel to determine its provisional funding requirements for a three year period on an annual basis in accordance with the Rules consultation procedures has been replaced by a requirement to merely determine its provisional funding requirements in accordance with the Rules consultation procedures. This is because the MCE has yet to determine the longer term funding arrangements for the Advocacy Panel.
8.10.3(c1)	-	A new clause 8.10.3(c1) has been inserted under which NEMMCO is required to provide the AEMC with such amounts as are necessary to enable the AEMC to provide the Advocacy Panel with the funds for which provision is made in the Advocacy Panel's annual report for the financial year ending on 30 June 2006. This is intended to provide for the Advocacy Panel's short term funding requirements, pending the MCE's decision on longer term funding arrangements for the Advocacy Panel.

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8.10.3(d)(2)(ii)	-	In order to more accurately reflect the current operation of the National Electricity Code, while also acknowledging the transfer of the relevant NECA functions to the AER, this clause has been amended to refer to an eligible project as one relating to (among other things) the monitoring, investigation, enforcement and registration exemption functions of the AER under the National Electricity Law and the Rules.
Part 8, Chapter 8A	This derogation includes amendments that are before the ACCC but that have not been determined by the ACCC. Such amendments should not be made until the ACCC has determined their acceptability.	The ACCC released its final determination on these amendments on 15 June 2005. As a result of that determination, the amendments have been included in the initial Rules.
	The amendments to this derogation require a commencement date to avoid market disruption caused through them coming into operation when the initial Rules came into operation.	In accordance with the ACCC final determination, and to align the derogation with quarterly settlement residue auctions, a start date of 1 October 2005 for clauses (f) to (p) of the derogation has been inserted into the Rules (see clause (e1)).
	-	On advice received from NEMMCO, the definition of SP _p in clause (k) has been amended to refer to the arithmetic average of the relevant SP _{d_p} values.

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Part 12, Chapter 8A	-	The provisions relating to ancillary services, which were previously contained in Schedule 9G2 of the second exposure draft of the National Electricity Rules, have been relocated to a new Part 12 of Chapter 8A as they are more appropriately characterised as a participant derogation under the new National Electricity Law.
9.8.4G	-	The redundant cross-references to clause 9.8.4E have been removed.
9.17.3	-	The opening words of clause 9.17.3 have been modified to conform with the wording used in the corresponding jurisdictional derogations for the Australian Capital Territory, South Australia and Queensland. In addition, clause 9.17.3(a) has been deleted as the substance of that clause is already contained in clause 5.1(b) of schedule 9G1 and clause S7.2.4(a) of schedule 7.2.
Schedule 9E1, Chapter 9	-	This schedule has been relocated so that it comes immediately after Part E, being the Part to which it relates.
Schedule 9G2, Chapter 9	-	See Part 12, Chapter 8A above.
Definition of "Reliability and Network Panel" (cl.9.42.1(b)) and cl.9.42.2, 9.45.2, 9.46.2 and 9.48.5	-	Minor amendments have been made to this definition and clauses 9.42.2, 9.45.2, 9.46.2 and 9.48.5.

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Definition of "B2B Proposal" (Ch. 10)	Insert "current B2B Procedures, <u>which is</u> the subject ..."	SCO agrees with the submission and the change has been made.
Definition of "Directed Participant" (Ch. 10)	-	The reference to Generators (which was substituted as part of preparing the exposure drafts of the National Electricity Rules) has been replaced by a reference to Scheduled Generators and Market Generators to be consistent with the persons to whom a direction may be given (see cl.4.8.9(a1)(1)).
Definition of "PASA availability" (Ch. 10)	-	The reference to "Scheduled Generator" has been replaced by a reference to "scheduled generating unit" for consistency with clause 3.7.3(d)(1).
Definition of "registered bid and offer data" (Ch. 10)	-	For consistency with other amendments made (see schedule 3.1) a reference to "Scheduled Generators" has been included in this definition.
Definition of "scheduled plant"	-	This definition has been put in alphabetical order.