From: Trevor St Baker [tstbaker@ermgroup.com.au]

Sent: Monday, 2 January 2006 11:33 AM

To: Submissions

Cc:

Subject: Proposal to remove NEMMCO's obligation to publisk SOO Updates mid year

ERM Group and Wambo Power Ventures Pty Ltd regard this proposal as very controversial and of serious implications to power generation developers.

ERM is presently the most prolific contemporary power generation developer in the NEM and also in WA also.

In financing and final project commitments to new generation investments great reliance is placed on NEMMCO's power & energy projections and on the status of existing and committed new generation developments by financiers and independent specialists engaged by lenders and investors to advise on new development proposals for considerations by investment risk analysts prior to financing approvals being able to be obtained. Regardless of the voracity of NEMMCO's projections of generation adequacy, which have been shallow and sub-standard to date, NEMMCO is the responsible authority and relied upon especially by investors and agencies which are not mainstream active participants in the electricity market. Given the relatively short lead-times for construction and commissioning of peaking generation plant, in particular, annual updates of electricity load growth projections and generation adequacy projections is far too long, and the mid-year updates essential for new generation developers.

It should in fact be of some concern that NEMMCO should consider such a change and to consider it non controversial. It will be irrelevant to many not involved in peaking generation planning and development, and to GOC's which are not subject to the financing approval disciplines which private sector developers ae subject to. NEMMCO should be more cognizant of the importance of its generation adequacy prognostications to the realization of new generation developments by private sector

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