13 June 2008

energex

The Reliability Panel
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Email: panel@aemc.gov.au

Dear Mr Woodward

Reliability Panel Technical Standards Review – Issues Paper

ENERGEX Limited (ENERGEX) welcomes the opportunity to comment on the Australian Energy Market Commission's (Commission) Reliability Panel Technical Standards Review – Issues Paper (Issues Paper). This submission is prepared by ENERGEX in its capacity as an electricity distribution network service provider (DNSP) in Queensland.

ENERGEX notes that the Reliability Panel is seeking comments on whether the scope of the technical standards is appropriate and in particular, which aspects of the technical standards could be removed or amended. ENERGEX's views are set out below.

Clause 9.37.12 Voltage Fluctuations Derogation

For application in Queensland, clause S5.1.5 of schedule 5.1 of the *National Electricity Rules* (the Rules) is replaced by the derogation set out in clause 9.37.12 of the Rules, which relates to voltage fluctuations. The removal of clause 9.37.12 will result in Queensland technical standards reflecting the current Australian Standard AS/NZS 61000.3.7, as opposed to the superseded Australian Standard AS 2279, Part 4 (edition 2 published in 1991). ENERGEX believes that the removal of the derogation will result in Network Service Providers (NSPs) in Queensland being consistent with utilities in other states, whilst also allowing potential benefits to be delivered to customers which operate in multiple states.

The Australian Standard AS2279, Part 4 only refers to Figure 1 of the old Australian Standard when addressing the subject of voltage fluctuations caused by loads. ENERGEX believes that the Australian Standard referred to in the derogation is too restricting and should be removed because Figure 1 only applies to step voltage changes and is not suitable for assessing other forms of periodic voltage fluctuations including ramps, double steps, triangular and rectangular shapes.

The Australian Standard AS2279 does not specify voltage flicker limits for customers and fails to provide detailed assessment when voltage disturbances come from multiple sources. The Australian Standard AS2279 appears to suggest the use of a flickermeter, however this suggestion is not captured by the Voltage Fluctuation derogation under clause 9.37.12.

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ENERGEX believes that the AS/NZS 61000.3.7 is the appropriate Standard to be used because it specifies planning levels and network users/customer allocation levels for voltage fluctuations limits. This specification provides a clear assessment process for disturbances coming from multiple sources.

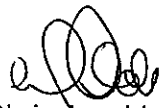
Lastly, the Voltage Fluctuations derogation only replaces S5.1.5 of Schedule 5.1 and not S5.1a of the Rules. This has created a problem for ENERGEX because all registered participants are required to comply with S5.1a of the Rules and NSPs are further required to enforce the Australian Standard AS/NZS 61000.3.7. Thus, the Australian Standard referred to in the derogation is inconsistent with the current applicable Australian Standard referred to in S.5.1a. ENERGEX believes that deleting the Voltage Fluctuations derogation will remove this inconsistency.

Technical Requirements for Embedded Generators

The specification for generators in the Rules does not include the technical requirements for embedded generation. ENERGEX has experienced an increase in request from customers to incorporate embedded generation within its distribution network. This is due to Commonwealth and State Government policies and rebate schemes, energy rating schemes and savings in renewable energy sources. It is for this reason that ENERGEX considers that technical requirements for embedded generators connected to a distribution network should be inserted into the Rules.

ENERGEX looks forward to engaging in further discussions with the Reliability Panel on the issues discussed in this submission. Please do not hesitate to contact me on (07) 3407 4497 should you wish to discuss this submission further.

Yours sincerely



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