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Melbourne Office

6 April 2005

Via email: jeastham@neca.com.au

Mr John Eastham Director National Electricity Code Administrator Level 5, 41 Currie Street Adelaide South Australia 5000

Dear John,

Proposed Code Changes: Information publication for non-scheduled generation

Following a recommendation from the recent wind energy technical advisory group (WETAG) process, NEMMCO has consulted with industry through the dispatch and pricing reference group (DPRG) and wind generators both represented and not represented on the DPRG to consider appropriate information disclosure arrangements for non-scheduled generation in the NEM. The DPRG includes representation from the NGF, ERAA, NSPs, NECA and NEMMCO.

This Code change submission by NEMMCO presents the results of that consultation and includes proposed Code changes for progression by NECA.

Of importance, the summary position presented by the DPRG and described below has received support from all groups in the consultation process, including NEM wind generators.

Background

Due to the variability of its energy source, wind generation is generally registered in the NEM as "non-scheduled generation" ¹. The recent expansion of wind generation projects has resulted in non-scheduled generation representing a significant generation source for the NEM and a very significant generation source in some NEM regions such as South Australia and Tasmania. Further wind generation projects are being investigated by developers that may also lead to significant wind generation projects in Victoria and potentially New South Wales.

Generation from non-scheduled sources can impact other market participants in the areas of network flows and market outcomes such as market prices, dispatch targets for scheduled generation, NEMMCO forecasts of the demand to be met by scheduled generation and key operational decisions by other market participants such as self commitment of generating units. When the volume of non-scheduled generation in the NEM was small it did not need to be specifically managed in the operation of the market. This is no longer the case.

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¹ Wind generation is defined by the Code as being *intermittent generation* which permits an applicant to apply for non-scheduled registration status. See Code Clause 2.2.3(b)(3) and the Code definition of *intermittent generation*.

Document Reference: Market Dev / NECA Submission NS Generation Information disclosure April 2005

Following discussions with the DPRG and wind generators, NEMMCO considers that additional information regarding non-scheduled generation is now required for the continued efficient operation and transparency of the market. The WETAG process identified this issue², noting in their final report that there may be merit in the provision of additional information regarding significant non-scheduled generation to facilitate the market.

DPRG Position Summary

The DPRG has considered the issue of appropriate information disclosure arrangements for non-scheduled generation in the NEM and established the following position in order to facilitate the market:

- Current NEM information publication arrangements for non-scheduled generation are not sustainable as the volume of non-scheduled generation is now material to the market.
- Information is required to be published for significant non-scheduled generation, including wind farms, in both the forecast and historical (actual generation) timeframes;
- Provision of additional information regarding non-scheduled generation will benefit the market by:
 - enhancing market transparency thereby enabling efficient operational decisions to be made by NEM participants; and
 - Enabling market participants to continue to model and understand the dynamics of consumer demand (which is the demand to be met by both scheduled and non-scheduled generation).
- Information disclosure arrangements for significant non-scheduled generation (greater than 30MW) should be broadly consistent with those for scheduled generating units.

² WETAG Final Report, "*Integrating wind farms into the NEM*", WETAG, January 2005. URL: www.mce.gov.au



Code change proposal

The following table summarises the information proposed by NEMMCO for publication in various NEM timeframes:

NEM timeframe	Additional information proposed for publication	Comment
Dispatch, predispatch, STPASA and MTPASA	Details of MW volume allowances made by NEMMCO for non-scheduled generation in forecasts of the demand to be met by scheduled generation.	To provide for disclosure of non- scheduled generation in the forecast timeframes.
Historical data ("day after" publication)	Details of actual generation for each non-scheduled generating unit or non- scheduled generating system (greater than 30MW), for the previous trading day.	To publish actual generation information for significant non- scheduled generation on a basis consistent with that for scheduled generating units.

Following the above industry discussions, NEMMCO provides the Code changes in attachment A for consideration by NECA. As the provision of non-scheduled generation projects to the NEM continues to gain pace, and that the Code change proposal has been consulted widely with industry is broadly supported, NEMMCO requests that NECA progress this issue at its earliest possible opportunity.

If you require further information on this proposal, please feel free to contact Mr Bruce Cameron on 02 9239 9115 or bruce_cameron@nemmco.com.au.

Yours faithfully

Brian Spalding Chief Operating Officer



Attachment A

Code changes proposed by NEMMCO: Information publication for significant non-scheduled generating units or non-scheduled generating systems

Only the affected parts of clauses are shown.

REFERENCE	CLAUSE WITH PROPOSED AMENDMENTS	REASON
Medium term PA	SA	
Clause 3.7.2(f)	 <i>NEMMCO</i> must prepare and <i>publish</i> the following information in respect of each day covered by the <i>medium term PASA</i> in accordance with clause 3.13.4: (1) forecasts of the most probable peak power system load plus required <i>reserve</i>, adjusted to make allowance for <i>scheduled load</i>, for each <i>region</i> and for the total <i>power system;</i> (1A) details of any allowance in MW made by NEMMCO for <i>non-scheduled generation</i> in forecasts published pursuant to clause 3.7.2(f)(1); 	This amendment clarifies the Code and enables NEMMCO to publish details of allowances made for non- scheduled generation in forecasts for MTPASA.
Short term PASA		
Clause 3.7.3(h)	 <i>NEMMCO</i> must prepare and <i>publish</i> the following information as <i>short term PASA</i> outputs for each <i>trading interval</i> in the period covered in accordance with clause 3.13.4(c): (4B) details of any allowance in MW made by NEMMCO for <i>non-scheduled generation</i> in any of the forecasts described in this clause 3.7.3(h); 	This amendment is to allow NEMMCO to publish details of allowances made for non-scheduled generation in the load forecasts for short term PASA.

REFERENCE	CLAUSE WITH PROPOSED AMENDMENTS	REASON
Pre-dispatch		
3.13.4(f)	 (f) Details of the pre-dispatch schedule to be published must include the following for each trading interval in the period covered: (1) forecasts of the most probable peak-power system load plus required reserve for each region and for the total power system; (1A) details of any allowance in MW made for non-<i>scheduled generation</i> in any of the forecasts described in this clause 3.13.4(f); 	To enable NEMMCO to publish details of allowances made for non- scheduled generation in predispatch forecasts.
Dispatch		
3.13.4	(s) Within 5 minutes of each time NEMMCO runs the dispatch algorithm, NEMMCO must publish for each regional reference node the sum of actual generation for each <i>non-scheduled generating unit</i> or <i>generating system</i> comprised of non-scheduled <i>generating units</i> where that data is available to NEMMCO and where that <i>non-scheduled generating unit</i> or <i>generating</i> <i>system</i> comprised of non-scheduled <i>generating units</i> has a combined nameplate rating greater than 30MW.	To enable NEMMCO to publish details of aggregate non-scheduled generation for each region following each 5 minute dispatch interval.

Actual Genera	ation	
3.13.4(q)	 Each <i>day</i>, in accordance with the <i>timetable</i>, <i>NEMMCO</i> must <i>publish</i> details of the following: (1) actual generation, dispatched generation, dispatched network service or dispatched load for each scheduled generating unit, scheduled network service and scheduled load, respectively, in each trading interval for the previous trading day; and (2) actual generation for each non-scheduled generating unit or generating system comprised of non-scheduled generating units where that data is available to NEMMCO and where that non-scheduled generating unit or generating unit or generating system comprised of non-scheduled generating units has a combined nameplate rating greater than 30MW, in each trading interval for the previous trading day. 	To provide Code clarification and to enable NEMMCO to publish actual generation, where available to NEMMCO, for both scheduled and non-scheduled generation >30MW. Actual generation in each trading interval includes the dispatch interval quantities within that trading interval – as is the case for scheduled generation under existing publication arrangements.