

notification to be provided by a distribution connected generator where it is satisfied that safe operating equipment and procedures and in place. System Management also proposes an ability to remove this exemption.

Alinta's views

Alinta supports System Management's proposed removal of unnecessary obligations on distribution connected generation particularly given that non-compliance could attract the application of a Civil Penalty. Alinta encourages the IMO to propose in its Draft Rule Change Report more succinct drafting to that presented in the Rule Change Proposal.

Alinta does however query whether the proposed ability for System Management to exempt a generator from the requirement to provide notification of synchronisation/desynchronisation could be further extended to transmission connected generation. Further details of Alinta's views are outlined below.

Transmission connected generators

The new Balancing market operates via System Management issuing multiple advanced instructions to Market Generators to vary the output or consumption of their facilities by issuing Dispatch Instructions, Operating Instructions and instructions under clause 7.6(c)-0.11590.11597123(i)1.8