

MMG Century

PO Box 8016 Garbutt Business Centre Garbutt Queensland 4814 Australia

T +61 7 4769 5031 info@mmg.com www.mmg.com

4 April 2014

Hayley Parkes Assistant Director Adjudication Branch Level 35, 360 Elizabeth Street Melbourne VIC 3000

Dear Ms Parkes

A91412 & A91413 - Stanwell Corporation Limited & Diamantina Power Station Pty Ltd - Submission

Thank you for the opportunity to provide a submission in relation to the above applications. We would like to verify that MMG has been involved in the development of the new NW district protocol and support the intent of the co-ordinated dispatch. We do not believe that the application will change the public benefits, effects on competition, or any other public detriment compared to the current agreement.

The following specifically outlines MMG's position on the items raised in your letter dated the 11/3/14.

- Provision of electrical supply information to the generators: No change from our current agreement. This information exchange is for the integrity of the network and contains no commercial details.
- Electrical Generator with facilities to join NWPS: MMG only has back up stand-by units.
- Alternatives to this arrangement: A separate network is the only option we can reasonably expect, this would be an unlikely alternative given the cost of the infrastructure required.
- Support the principles of the Dispatch Protocol & Schedule 1: MMG support these principles to ensure the integrity of a high voltage network.
- Potential to lead to public benefits: The proposed system is unlikely to provide a benefit beyond having a new more efficient and reliable generator in the network. This will not benefit MMG, but could do so for sections of the public.
- Potential to lead to public detriments: The proposed system will not lead to public detriment. As noted above it has the potential for a small improvement.

As noted in our teleconference on Thursday 27th March, our only concern is relation to the performance management of the Generator Co-ordinator role. We appreciate that this is logically a DPS position and that the incumbent will operate the system in a fair and consistent manner. We also appreciate that the new dispatch protocol always MMG the opportunity to vote on a replacement. In the case of unfair activity, the likely replacement will also be from DPS.

If you have any further queries on the application or the contents of this submission, please don't hesitate to contact me.

Yours faithfully

Mark Albertson Operations Manager

+61 7 4769 5987 +61 477 352 384 mark.albertson@mmg.com