Cowell Electric

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Georgina Lawrence
Manager – Licensing, Monitoring and Reporting
ESCOSA
G P O Box 2605
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Dear Georgina

Following discussions between ESCOSA, Department for Energy and Mining (DEM) and Cowell Electric on 27/7/20 we have identified that the structure of Annexure 3 of our Electricity Retail, Distribution and Generation Licence is overly specific for the generation plant in the Remote Area Energy Supply (RAES) sites for the following reasons;

- As the owner of the RAES infrastructure, DEM's Asset Management plan for the RAES sites incorporate a Generator Replacement Program (GRP) whereby several items of generation plant are replaced every year to maintain a rolling 10 year refresh of the generation equipment at each site. This 10-year cycle equates with the approximate operating lives of the generation equipment within the existing n+1 generation philosophy,
- The procurement of new generators under GRP begins with an estimated size of generator, final rating may not be determined until final construction and installation three to six months later
- The very remote location of RAES sites, the impact of weather, accessibility and the installation changeover period while maintaining supply can vary greatly
- There may be the occasional need for the installation of temporary generation capacity in the event of a generation asset failure,

With Annexure 3 in its current form, it creates a requirement to apply to vary the licence 2-3 times per year as ageing generation equipment is replaced under the GRP. This is administratively burdensome, for both Cowell Electric and ESCOSA. As discussed, specific rating and installation time adds complexity to providing an accurate variation request.

For these reasons we seek permission to structure Annexure 3 so that the generation mix and capacity of the power station can include a combined mix of renewables, diesel and gas up to a kW (capacity) for each station. Per the usual requirements, we will report the actual size and generation mix of each station in our Annual Return, and can then apply to vary the licence only when:

- the maximum capacity is required to be increased or
- it is intended to substantially alter the generation mix

without the need to apply to vary our licence.

Please find attached draft for your comment that we believe allows greater flexibility to suit our unique structure and is a less cumbersome way of structuring Annexure 3.

We look forward to further discussions and if you have any queries please do not hesitate to contact me.

Yours sincerely

Cameron Thompson
Chief Executive

Existing Annexure 3

Location	Fuel Source	Total capacity (kW)
Blinman	Diesel	300
Glendambo	Diesel/Gas	450
Kingoonya	Diesel	162
Mannahill	Diesel/Gas & Diesel	177
Marla	Gas, Diesel & Diesel/Gas	458
Nundroo	Diesel	400
Oak Valley	Diesel	450
Oodnadatta	Gas & Diesel/Gas	560
Parachilna	Diesel	220
Maree	Diesel/Gas	540
Umuwa	Diesel	4870
Amata	Diesel	1190
Murputja	Diesel	420
Pipalyatjara	Diesel	838
Pukatja	Diesel	870
Yalata	Diesel	640

Proposed Revision

Maximum Capacity by Fuel Source

Location	Maximum Diesel/LPG (< kW)	Maximum Solar PV (<kW)	Maximum Storage (<kW)
Amata	1,500		
Blinman	300	150	150
Glendambo	500	250	250
Kingoonya	300	150	150
Manna Hill	200	100	175
Maree	750	500	500
Marla	500	250	250
Murputja	750	250	250
Nundroo	500	250	250
Oak Valley	750	250	250
Oodnadatta	750	500	500
Parachilna	250	100	100
Pipalyatjara	1,000	500	500
Umuwa	5,500	3,000	2,000
Yalata	1,250	750	750
Total	**14,800**	**7,000**	**6,075**

* Note that the Pukatja generation plant has been decommissioned and fully removed from site and now serves as a substation from Umuwa.