

20 February 2009

Wind Generation Licensing – Draft Proposals
Essential Services Commission of SA
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Attn: Margaret Cross

WIND GENERATION LICENSING – DRAFT PROPOSALS

Cathedral Rocks wind farm welcomes the opportunity to contribute to the review of South Australian wind generation licensing conditions (ESCOSA licensing principles). South Australia's electricity transmission system faces unique technical and economic challenges related to the rapid deployment of wind generation on a small and geographically dispersed grid. Cathedral Rocks wind farm acknowledges the effectiveness of ESCOSA's licensing principles to date, ensuring an orderly roll out of wind generation in South Australia.

Cathedral Rocks wind farm has been successfully integrated into the Electranet system and has been contributing to South Australia's electricity needs since 2005. Effective mechanisms are in place to manage both wind farm forecasting through the NEMMCO AWEF system and network loading through ElectraNet's SCADA system, in accordance with its connection agreement.

This wind farm was registered as non-scheduled prior to implementation of the ESCOSA licensing principles and would appear largely unaffected by the proposed changes. It is noted however that page 12 of the *Wind Generation Licensing Draft Proposals* document states that "The Commission has requested ESIPC to review other pre-2005 licences". This statement is made in the context of application of semi-dispatch.

Any future move to review the non-scheduled status of pre-2005 licensees would represent a matter of serious sovereign risk. Investors committing to high-value long-life infrastructure projects such as wind farms do so with the reasonable expectation that they would be immune from punitive retrospective changes to network access arrangements.

We thank you for the opportunity to participate in this review. Please do not hesitate to contact Andrew Jones (Roaring 40s Manager Market and Regulation) on 0400 537 944 if there are any questions regarding this submission.

Yours Sincerely



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