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Margaret Cross
Executive Director Regulatory Development and Implementation
Essential Services Commission of SA
GPO Box 2005
Adelaide SA 5001

By Email to escosa@escosa.sa.gov.au

Dear Margaret

Wind Generation Licensing – Draft Proposals

1 Introduction

Thank you for the opportunity to provide a submission in relation to the Essential Services Commission of SA's ("the Commission") draft proposals for wind generation licensing. In general TrustPower supports the draft proposals but makes the following specific comments.

2 Comments on Specific Proposals

2.1 Central Dispatch

The Commission is proposing that all future wind generation licensees must be classified as semi-scheduled under the National Electricity Rules ("NER"), and to retain the current licence condition for post-2005 licences. The Commission is also reviewing through the Electricity Supply Industry Planning Council ("ESIPC") all pre-2005 licences.

By changing the requirement from the existing licence condition new wind farms will be precluded from participating as a scheduled generator. Although it is most likely that new wind generation developers will wish to register as semi-scheduled, there may be some cases where it is more appropriate to register as a scheduled generator. Both the semi-scheduled and scheduled categories meet the objective of the Commission's 2005 decision.

TrustPower proposes that the Commission does not change the 2005 licence condition. This allows new wind generation to choose between the semi-scheduled and scheduled generation category, but does not allow classification as a non-scheduled generator.

TrustPower supports the review by ESIPC of pre 2005 licences, and agrees with ESIPC that it would be desirable for those pre 2005 licensees that are technically capable of generation dispatch to be classified as either semi-scheduled or scheduled generators.

2.2 Wind Forecasting

The Commission is proposing to remove the condition to provide wind forecasting information to NEMMCO for new wind generators only.

TrustPower supports the removal of this condition but believes that it should also apply to existing wind generators. TrustPower also believes that any information request by the Commission or ESIPC should be in the same form as that required by NEMMCO under the AWEFS system. This will avoid the need to provide the same information in multiple formats.

2.3 Ancillary Services

The Commission is proposing to remove the specific provisions in relation to ancillary services and metering as these are covered by the NER.

TrustPower supports the removal of this condition by believes it should all apply to existing wind generators.

2.4 Technical Standards

The Commission is proposing to retain the present technical standards in relation to fault ride through and reactive power, and to review and refine the technical licence conditions.

Until the outcome of that review TrustPower is unable to provide specific comments on what is being proposed.

Although TrustPower acknowledges that the level of wind penetration in SA is very high by international standards, it is undesirable to have two sets of standards covering technical performance. It seems more appropriate to try and use the NER process to impose appropriate technical standards. By having multiple sets of standards there is always the risk of conflict between the respective requirements.

Yours sincerely



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