

A few
words.

24 July 2009

Dr Pat Walsh
Chairperson
ESCOSA
GPO Box 2605
Adelaide SA 5001

By email to: escosa@escosa.sa.gov.au



Dear Pat,

Draft Decision – Licence Conditions for Wind Generators

AGL welcomes the proposed changes in the licence conditions for Wind Generators that eliminate some the duplication of requirements currently in the National Electricity Rules (the Rules).

We remain concerned, however, that any specific licence conditions for wind farms in South Australia remain since these conditions:

- are discriminatory as they single out a single technology, contrary to other SA legislation, and inconsistent with the Act empowering ESCOSA;
- are not required as the Rules define the necessary requirements for all generators. The operation of the Rules is now managed by the Australian Energy Market Operator (AEMO). AEMO has subsumed the previous functions of the Electricity Supply Industry Planning Council from 1 July 2009. It is therefore inconceivable that any advice regarding the operation of the market in SA will now be different to any provided to the remainder of the National Electricity Market (NEM).
- cause a deadweight loss on SA since requirements above those actually required by the NEM cause generators to incur unnecessary costs.

That said, AGL's comments on specific provisions are included below.

Central Dispatch

The proposed provisions are acceptable.

Wind forecasting

The proposed provisions are acceptable.

Ancillary Services

The proposed provisions are acceptable.

Technical Standards

As discussed above, AGL believes that separate technical standards for SA are pointless. AEMO's opinion on these licencing principles should be sought and, if AEMO considers that it is capable of applying access standards and operating the SA system in a way that will

deliver reliable operation, the specific technical standards in these licencing principles should be withdrawn.

On the specific standards:

- **Fault Ride Through.** The changed provision may be slightly less onerous than the previous one as duration is limited to primary protection times (typically 100-120msec) compared with the previous time of 175msec. The difference between two-phase ground faults and three-phase faults is not important as the previous ESCOSA principle required ride through of a 0% nominal voltage condition (equivalent to a solid 3 phase fault) for 175msec.
- **Reactive Power.** The proposed changes do not materially increase the impost of the reactive support provisions. AGL, in common with other developers, believes that the requirement to install large amounts of reactive support irrespective of network location is illogical and uneconomic.

On an issue of detail, the assumptions regarding control modes make the wording unsuitable for a license condition. The following points should also be considered with regard to this proposed change:

- ⇒ There is no requirement under the NER for such control mode change capability.
- ⇒ This change appears to run counter to the ESCOSA principles of trying to align their licensing requirements more closely with the NER.
- ⇒ It could be argued that the proposed change is technology-specific as it assumes a particular approach to operation during disturbances.
- ⇒ ESCOSA provides no discussion on this proposed change. The requirement for generating system control-mode change is, however, poorly worded and makes assumptions regarding control modes. It could be considered as technology-specific and inconsistent with the NER. Re-wording of the proposed change would be required to remove these concerns.

AGL looks forward to the outcome of your review and hopes that it will support the consistent application of the NER across the NEM.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alex Cruickshank'.

Alex Cruickshank
General Manager Energy Regulation