



**TrustPower Australia
Holdings Pty Ltd**
ABN: 15 101 038 331

Mail Address:
Adelaide Office
GPO Box 1512
Adelaide, SA 5001
Australia
Ph/Fax: +61 1300 888 282
www.trustpower.co.nz

27 July 2009

Margaret Cross
Executive Director Regulatory Development and Implementation
Essential Services Commission of SA
GPO Box 2605
Adelaide SA 5001

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

Licence Conditions for Wind Generators – Draft Decision June 2009

1 Introduction

TrustPower Limited is the ultimate parent company of TrustPower Australia Holdings Pty Ltd, Snowtown Wind Farm Pty Limited and Sellicks Hill Wind Farm Pty Limited (together referred to as "TrustPower") whom have interests in both existing and proposed wind farms in South Australia.

This letter is TrustPower's submission in response to the "Licence Conditions for Wind Generators – Draft Decision" the issued by the Essential Services Commission of SA ("ESCOSA") in June 2009 and the "Statement of Clarification, Draft Decision Licence Conditions for Wind Generators, Fault Ride Through Requirements" issued by ESCOSA in July 2009.

TrustPower's views on ESCOSA's Licence Conditions for Wind Generators in South Australia are essentially still the same as those submitted to ESCOSA in August 2005 in response to the Wind Farm Licensing Draft Statement of Principles issued by the ESCOSA in June 2005.

TrustPower is generally supportive of ESCOSA's aim of better aligning its Licence Conditions for wind generators with the National Electricity Rules ("NER") and the use of Licence Conditions to require sensible, economic technical conditions that will facilitate high rates of wind penetration into the South Australian transmission network.

2 Draft Fault Ride Requirements

TrustPower believes that it is essential that the requirements of clause S5.2.5.5 (b) (2) of the NER are capable of being negotiated under the NER as most (if not all) wind turbine models would find it impossible to meet these rules, especially clause S5.2.5(b)(2)(iii) of the NER which relates to the requirement to supply active power of at least 95% of the level existing just prior to the fault within 100 milliseconds.

TrustPower also notes that the Australian Energy Market Commission recorded that this is what they intended when they introduced the new rules in their 8 March 2007 rule determination.

ESCOSA's "Statement of Clarification, Draft Decision Licence Conditions for Wind Generators, Fault Ride Through Requirements" suggests that ESCOSA will adopt this approach in its final decision. TrustPower supports this.

3 Application of New Licence Conditions

TrustPower understands that ESCOSA intends to include the new proposed conditions in any new generation licence approved from now on, even though the proposed conditions form part of a draft decision only, still subject to consultation and a final decision by the ESCOSA. Given that the ESCOSA's reason for this approach was driven by the view of its technical advisors that

the new proposed standards did not impose any significant additional obligations on wind generators TrustPower recommends that the Commission continues to apply the existing Licensing Principles until the consultation process and final determination is made on the proposed new conditions.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Rodney Ahern' with a period at the end.

Rodney Ahern
Business Development Manager

Mobile: +61 409 099 212

Email: rodney.ahern@trustpower.com.au