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Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
Australia Square NSW 1215
AUSTRALIA

By Email to submissions@aemc.gov.au

Dear Dr Tamblyn

SUBMISSION ON TECHNICAL STANDARDS FOR NON-SCHEDULED GENERATION

1 Introduction

TrustPower Limited ("TrustPower") is the ultimate parent company of TrustPower Australia Holdings Pty Limited, which is presently pursuing wind development opportunities in South Australia. TrustPower welcomes the opportunity to comment on the proposed rule changes proposed by NEMMCO.

TrustPower is aware that the Australian Wind Energy Association ("Auswind") is preparing a submission on behalf of wind generators and supports that submission. This submission concentrates on the most critical issues that affect TrustPower's ability to further develop wind farm opportunities, and adds to the submission made by Auswind.

2 Specific Comments

2.1 Clause 2.9.2 (d)

NEMMCO's proposal is inconsistent with the concept of automatic access standards. It is conceivable that the new sub-clause that NEMMCO proposes could apply conditions more onerous than the automatic access standards. If this is the case then the automatic access standard concept is superfluous, because NEMMCO can effectively open up any standard to negotiation and ultimately decide any condition irrespective of the automatic standard. If the automatic standards are inappropriate then these should be amended rather than introduce this sort of change in another part of the rules.

When new generation projects are developed, negotiation of access standards generally occurs with the NSP and NEMMCO prior to project commitment. As the process proposed in the new clause occurs at registration, standards which have previously been agreed prior to project commitment as part of the network connection could be now overridden at registration time. Any new standards imposed at this stage may add significant cost to a project, which had been committed and funded on the basis of the original negotiated access standards.

2.2 **Clause 5.3.7A**

In the proposed new clause NEMMCO is requiring disclosure of the entire connection agreement, which will include sensitive commercial arrangements of no relevance to determination of performance standards. The requirement to submit the connection agreement should be limited to those portions relating to performance standards. The Network Service Provider and the Connection Applicant should be required to certify that all relevant sections have been disclosed.

2.3 **Clause S5.2.5.11 (e)**

This clause has now been modified to include non-scheduled generation. The requirement to not increase generation output as a result of an increase in frequency or to reduce output as a result of a decrease in frequency is entirely appropriate. However the requirement should be limited to changes in output as a direct result of the frequency excursion. Generators such as wind turbines may decrease output at the time of a frequency excursion if by chance a change in wind conditions occurs at the same time. This is totally out of the control of the wind generator, except in the case of increasing output, which may be able to be limited by some turbine types.

The effect of changes in the output of wind turbines and other intermittent generation due to other factors such as wind variability is being handled in the work stream looking at semi-dispatch rules.

3 **Conclusions**

TrustPower supports the work that has been done by NEMMCO to provide a revised set of technical standards to accommodate the different characteristics of a wind farm compared to traditional scheduled synchronous generation. In particular the adoption of national standards through the adoption of revised technical standards in the NERs will hopefully eliminate the additional standards that are being imposed at a state level, particularly in South Australia through licensing requirements.

Yours sincerely



Peter Calderwood
STRATEGIC BUSINESS DEVELOPMENT MANAGER