

10th Oct 2012

Submissions
John Pierce
Chairman
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Re: Australian Energy Market Commission's Transmission Frameworks Review

Dear John Pierce,

Thank you for the opportunity to submit comments in relation to AEMC's Transmission Frameworks Review. Suntech is one of the world's leading photovoltaic module manufacturers utilising technology jointly developed with the UNSW. Suntech employs 30 direct staff in Australia through our commercial offices at Suntech Power Australia and our research facility at Suntech R&D Australia. Suntech invests over \$5million annually on R&D in Australia to further advance our leading technology position.

The key recommendations of our submission are:

1. **Support AEMO as the National Planner.**
Suntech do not however support the reduction of AEMO's Victorian planning responsibilities and connections arrangements. This would result in a reduction in competition in the marketplace for new transmission connections.
2. **Do not support OFA in current form.**
The goal of the Optional Firm Access must be to reduce connection times and costs. The current proposal does not appear to address this over-arching goal, particularly with respect to smaller generator access. In principle this is a good concept, however it needs to produce an industry benefit by reducing the connection costs, particularly in instances where the small size of the generator mitigates the impact of the connection.
3. **Third Party Access.**
We support the provision of third party access regulations, however this needs to be a simple process that can be equitably applied to by all entrants.



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4. **Genuine Contestability.**

The proposed open-book arrangement between the TNSP and the connecting part are in general supported, however we consider this to be difficult to manage and enforce. We would also suggest a regulated rate of return for TNSPs, scheduled or fully contested works, and more importantly providing an opportunity for TNSPs to compete against each other across each other's networks.

Sincerely,



Stefan Jarnason
Technical Director
Suntech Power Australia



Suntech Power Holdings

Suntech Power Holdings Co., Ltd. is the world's largest producer of solar modules for residential, commercial, industrial, and utility applications. Founded by eminent solar scientist and Australian citizen Dr. Zhengrong Shi in 2001, Suntech's mission is to provide everyone with reliable access to nature's cleanest and most abundant energy source. With regional headquarters in China, Switzerland, Australia and the United States, and gigawatt-scale manufacturing, **Suntech has delivered more than 20 million solar modules** in more than 80 countries.

The company has witnessed tremendous success in the last 10 years; in fact, Suntech by the end of 2011 Suntech had delivered **more than 5.5GW of solar modules** that have been installed by customers and partners around the world. These modules generate enough clean electricity to offset approximately 3.8 million tons of CO² per year: this is similar to planting 10 million trees or removing 1.6 million cars from the road. With growing adoption of solar among more and more countries around the world, Suntech aims to achieve the 10GW milestone in the next two years.

All of Suntech's R&D programs have a clear goal – to **reduce the cost of harnessing solar energy and increase the performance of solar cells and modules**. Suntech has assembled a global R&D team of 450 full-time professionals around the world working to provide our customers with superior, high performance solar products for every application. Suntech's SuperPoly and Pluto™ cell processing technology are contributing to the growth of Suntech's installed capacity around the world, and will be playing an important role in achieving the 10GW milestone.

Suntech invests internationally and works with local partners around the world to create local jobs and make solar affordable for everyone. In fact, **every 10 jobs in Suntech factories create 15 jobs in local customer markets!**

With the goal of achieving retail grid parity in 50% of global markets by 2015, **Suntech delivers what customers value most – bankable solar**. Our customers have come to realize that they are buying a 25-year relationship, and not just a product.

Suntech is committed to reducing the solar cost through scale-up economy, value chain development and technological innovation as it believes it can play a significant leading role in promoting solar power worldwide, and help make solar energy more affordable for everyone.

Suntech Power Australia

Led by Dr Zhengrong Shi, an Australian Citizen who studied Photovoltaic's at the University of NSW (UNSW) with Suntech's Chief Technology Officer Professor Stuart Wenham, Suntech is very proud of its strong Australian origins. The solar cell technology that is currently being deployed all around the world was originally developed in conjunction with the UNSW, with royalties continuing to flow back to the UNSW.



As the wholly subsidiary of Suntech Power Holdings, Suntech Power Australia was founded in 2007 with Jenny Lu as Managing Director. Suntech have held the leading market position in Australia since 2008, and offer the highest level of customer support through their comprehensive technical support team led by Technical Director Stefan Jarnason, who has over 15 years of diverse photovoltaic industry experience. Suntech is committed to supporting the continued growth and investment in Australia's solar industry through the provision of premium quality solar products, technical support, business partners and industry involvement.

Suntech Australia's team comprises 30 professionals focusing on the following activities:

- Expansion of the residential, commercial and utility solar PV industry.
- Collaboration with local distributors, installers, energy companies, renewable energy developers, and EPC construction companies.
- Research and Development to further enhance product efficiency and lower costs.
- Proactively lobbying governments to implement cost effective solar support mechanisms.
- Working with industry and regulatory bodies to reduce barriers to solar PV electricity generation.

Suntech R&D Australia

Suntech R&D Australia develops advanced silicon cell technologies and promotes quality in manufacture through improved process controls. Suntech R&D Australia is an experienced team of 20 PV scientists and engineers headed up by Dr Renate Egan who have been working together on **developing advanced silicon photovoltaic technologies for over fifteen years.**

Building on the relationship between Suntech and the world-class photovoltaics research at UNSW, Suntech is increasing its activity with UNSW and other research partners in Australia through the establishment of a the Solar Industrial Research Facility (SIRF) at UNSW.

"We believe that, in establishing Suntech R&D Australia, with a focused strategy and the right team, we will add significant value to the company's global R&D resources" said Dr Zhengrong Shi in 2011. He adds "Suntech celebrates 10 years since foundation this year, and we have funded research and development in Australia since our earliest days. I look forward to the increased activity and technology developments that will result from our investment in Suntech R&D Australia."