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Steven Graham  
Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

**Consultation Paper: National Electricity Amendment (Connecting Embedded Generators) Rule 2012, AEMC, 14 June 2012, Sydney**

Dear Steven

In reference to the above paper, WSP are pleased to provide this submission in support of the proposed rule change.

WSP are an international consulting firm with 14,500 staff globally, within the Asia Pacific region, WSP employ approximately 450 staff who are dedicated to engineering within the built environment. WSP offer services that are directly affected by the above mentioned rule change, these include Electrical, Mechanical and specialist environmental design consulting services.

WSP offers services to a wide range of clients across a wide range of project types. Clients extend to both public and private stakeholders and project types include; health care, tertiary and primary education, commercial, residential and public facilities including community centres, libraries and sporting facilities. All of which investigate the use of on-site energy generation and the potential for embedded energy networks.

With reference to a current project involving an embedded energy system, we provide the following example as a means to demonstrate the issues that we and our clients are currently facing with such systems.

WSP have been involved in the Melbourne Park Redevelopment – Eastern Plaza redevelopment since June of 2010, whereby our direct client WATPAC is engaged by Major Projects Victoria, the government based department acting on behalf of many stakeholders. During Design Development, it was recommended to the client that a PV array be installed, the size of which in the end was determined by the Victorian services installation rules. These rules limit the capacity of the embedded generation to 30kVA if no generation agreement is reached with the supply authority. Reaching a mutually satisfactory generation agreement can take a lot of time and money. This would drive most projects to be within the limitation range which would inhibit the roll out of any large scale embedded generation systems. This project was testament to this, where time constraints of the project and a perceived lengthy application period, it was deemed appropriate to comply with the rules rather than directly engage with the supply authority on this issue. We further note that the business case for the PV array existed to significantly increase the capacity of the array, however, with the afore mentioned issues in mind it was deemed appropriate to limit the size to 30kVa.

It is also our experience that the current client negotiation/planning procedure implemented by Citipower also exacerbates the issue due to the time taken to respond, requirement for upfront detailed information and lack of forth coming information on the network capabilities.

The example provided above is just one of many projects which experience similar issues with the infrastructure authorities. We trust that this will add further weight to the proposal to amend the National Electricity Rule.

Yours sincerely



David Jarratt  
Director