

27 June 2006



Australian Energy Market Commission  
PO Box H166  
AUSTRALIA SQUARE NSW 1215

By email: [submissions@aemc.gov.au](mailto:submissions@aemc.gov.au)

Dear Sir/ Madam

### **NEMMCo Rule Change Proposal – Technical Standards for Wind Generators**

The Energy Retailers Association of Australia (ERAA) welcomes the opportunity to provide a submission on the above rule change. The ERAA is an independent association representing ten retailers of electricity and gas throughout the National Electricity Market (NEM) and the National Gas Markets. ERAA members collectively provide electricity to over 98% of customers in the NEM and are the first point of contact for end use customers for both Gas and Electricity.

The ERAA supports specific technical standards for wind generators, given their unique nature and their increasing share of system load.

We believe the standards should strike a balance between allowing the growth of wind farms, while ensuring the market does not have an unmanageable amount of unscheduled load. In this regard we note that NEMMCo has completed preparatory work on the semi-dispatch of load. We encourage NEMMCo to complete this work expeditiously.

The ERAA believes it is vital that the technical standards and compliance regime be easily understood and not too onerous and costly to implement. Investors should have certainty as to their on-going regulatory obligations prior to making investment decisions. In addition, the cost of any increased obligations should not be at a level which outweighs the reliability benefits.

For current owners of generation, who made investment decisions in the absence of specific technical standards, the rule changes should not put them at a significant disadvantage by imposing overly costly obligations which would make their investment uneconomic.

If you have any queries on the content of this submission, please contact me on (02) 9369 4296.

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Yours sincerely,  
*[Transmitted electronically]*

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