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Attn: Tyson Self, Manager Projects, Access

**Western Power's (WP) Proposed Revision to the Access Arrangement (AA) for the WP Network to apply from 1 July 2012– Appendix B: Application and Queuing Policy (AQP)**

**Introduction**

Moonies Hill Energy Pty Ltd (MHE) has development approval to develop a windfarm in the Shire of Kojonup, in Western Australia. This development will generate significant environmental, economic and social benefits to the Shire of Kojonup and the broader Great Southern Region.

MHE would like to provide the following submission and comments specifically focussed on the “enquiry stages” of the revisions proposed by WP to the AQP.

**Summary**

MHE is supportive of a change to the AQP. MHE through its experiences associated with its windfarm development, believes changes are required to the current procedures to allow timely and informative discussions to occur at the feasibility stage of new projects. MHE believes the current process is flawed and does not allow potential market entrants to deal with access issues in a timely and cost effective manner. As identified by WP in previous submissions, if left unchanged, the current AQP process will distort the basis on which new generation projects can gain access to the SWIS and compete in the WEM.

**Section 17A. Pre-enquiry discussions and 18. Enquiry stage.**

The current AQP does not allow prospective entrants, to obtain from WP, information related to capacity in the SWIS - especially in the feasibility stages of their projects. WP will not provide even “basic” capacity information, especially where entrants are competing for capacity. This has necessitated potential market entrants commissioning external consultants to provide “notional” capacity and feasibility information in relation to their projects.

It would seem incongruous that potential market participants need to obtain information related to the WP network, from parties other than WP. Consequently, MHE supports the introduction of a multi stage process which includes, pre enquiry discussions, an enquiry stage and then application process. Although we note that these discussions and information provided in the early stages are non-binding, its imperative that the AA mandate an information flow to potential entrants to obtain initial information before proceeding to an application phase.

Our previous comments indicated that the concept of the “enquiry stage”, as proposed by WP, needed to “value add”, be more “specific and mandatory” and not be an additional cost to potential entrants, with little or no additional information provided to applicants. MHE believes that the changes proposed by WP generally achieve these outcomes. More specifically we note;

## 18.2A

We note that WP have revised Section 18.2A to clearly indicate that the “Enquiry Response Letter” sets out information related to: information required in an application; spare capacity; existence of competing applications; and constraints to provision of the capacity. MHE welcomes these changes and is therefore supportive of the revisions in Section 18.2A.

### 18.2A(b)

In Section 18.2A(b), WP has proposed that it will “*endeavour*” to send the enquiry response letter to the applicant within “**40**” business days of the lodgement of the enquiry. MHE is supportive of the insertion of this timing. However, whilst accepting of the timing, it is with the proviso that the response should be on the same basis as in 19.1, that it should be WP “*must provide*” a response within 40 days.

MHE thanks the ERA for the opportunity to provide these comments and is happy to discuss further or clarify any of the comments made.

Regards  
Ian Devenish, Director.



**Ian Devenish**