## **Community Electricity**

# Submission in Response to ERA Public Consultation

### Application for exemption from certain requirements of the Technical Rules submitted by Western Power – connection of Nilgen Wind Farm

#### Standing

Community Electricity ("Community") is a member of the Technical Rules Committee.

The Authority has not referred this issue to the Technical Rules Committee and Community is responding in a private capacity.

Community has no commercial interest in the Authority's determination.

#### Assessment

Community notes that:

- The existing network configuration is subject to a very low probability of overloading in the Neerabup load area at times when all existing generators are exporting at full capability;
- The probability of overloading would increase slightly as a result of the unconstrained connection of Nilgen Wind Farm;
- Western Power proposes to connect Nilgen Wind Farm subject to a 'runback' (constrained output) requirement which is estimated to be required for an extremely low number of hours per year and will have an immaterial operational impact;
- No other network user will be affected by the connection via diminished safety and reliability, or stifled strategic network developments;
- Western Power considers that there were no alternative options identified that can entirely eliminate the need for runback while at the same time being financially acceptable to Nilgen.
- The Nilgen developer, which possesses sufficient technical and commercial resources, understands and accepts the commercial, technical and operational consequences of the arrangement and agrees to it.

On this basis, Community supports Western Power's application on the grounds that it is a reasonable, cost-effective and pragmatic means of meeting the customer's needs in a timely manner, thereby optimising use of the existing network, delivering additional service and increasing revenue.

#### Additional

In response to the specific issues raised by the Authority, Community advises that it accepts in good faith Western Power's representations that the proposal would not

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materially impact on other network and there aren't any reasonable alternative options that would comply with the Technical Rules.

Contact

For further information or comment, please contact:

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