

18 May, 2005

Mr Adam Phillips

Licensing, Monitoring and Customer Protection Division
Economic Regulation Authority
Level 6
Governor Stirling Tower
197 St Georges Terrace
Perth WA 6000

COMMENT ON DRAFT ELECTRICITY GENERATION LICENCES

Dear Adam,

Thank you for the opportunity to comment on the ERA's draft electricity generation licence. Renewable Power Ventures wishes to make the following comment:

- a. **Expiry Date.** RPV feels that the licence expiry date should be related to the expected life expectancy of the plant. This could be reasonably determined by reference to the engineer certified life of type provided by a reputable certifying agency (e.g. Germanischer Lloyd or DNV in relation to wind farms). The long term licence would provide certainty to the generator, therefore improving the ability to finance new generating plant. The ERA's right to cancel the licence, in accordance with the Act would not be affected.
- b. **Performance Audit and Asset Management System Review.** The ERA will be in a far better position to identify when these processes are due to be undertaken and could therefore initiate the bi annual process by contacting the generator, rather than placing the burden on the generator to initiate the process.

Please feel free to contact myself at any time if you wish to discuss these or other points.

Regards,



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