

## **Proposed Variations To Western Power’s Access Arrangement – 2009/10 to 2011/12.** **Application and Queuing Policy**

### **Introduction**

Moonies Hill Energy Pty Ltd (MHE) is developing the Flat Rocks Wind Farm (FRWF), located near Kojonup, in Western Australia. The FRWF will generate significant environmental, economic and social benefits to the Shires of Kojonup and Broomehill - Tambellup and the broader Great Southern Region.

I refer to the submission from Western Power (WP) dated 20 December 2010, proposing modifications to its Applications and Queuing Policy and the ERA’s invitation for public submissions.

MHE provides the following submission, specifically focussed on the enquiry stage of Western Power’s proposal.

### **Overview**

In summary, MHE is generally supportive of a change. As identified by WP in its submission, 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. 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.

### **3.2.3 Enquiry and application commencement**

The current application and queuing process does not allow prospective entrants, to obtain from WP, information related to capacity in the SWIS - especially in the feasibility stages of their projects. Where entrants are competing for network capacity, WP will not provide even “basic” capacity information. 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 2 stage process and a process that allows potential entrants to obtain initial information before proceeding to an application phase.

However, the concept of the “enquiry stage”, as proposed by WP, needs to “value add” and not be an additional cost to potential entrants, with little or no additional information provided to applicants.

The information to be provided to applicants in the “Enquiry Response Letter” needs to be more clearly specified and needs to be more than procedural in nature. MHE would suggest that the amendments in 18.2A of WP’s applications and queuing policy need be *more specific and mandatory*, in terms of information that WP provides in the enquiry stage.

Whilst MHE acknowledges that WP may carry out studies on behalf of the applicant, a *specific and mandatory* level of detail needs to be included in the enquiry response for the

fee charged. This could include (but not limited to), capacity information, known network constraints or issues and the existence of competing applications (only the existence, not detail). Whilst the level of detail and information to be included will no doubt be debated, the main issue is that WP must provide applicants with certain information, otherwise the enquiry stage adds no real value to applicants.

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**

