

Community Electricity

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Submission in Response to ERA Public Consultation

Application for exemption from certain requirements of the Technical Rules submitted by Western Power Byford PV solar farm (3 x 9.9 MW) connections 2012

Standing

Community Electricity is:

- a. a licenced Electricity Retailer and a provider of Electricity Retail Services and Market Consultancy;
- b. a member of the Independent Market Operator's Market Advisory Committee;
- c. a member of the Economic Regulation Authority's Technical Rules Committee.

Community has no commercial interest in the matter of the application.
Our commercial objectives are aligned with the Wholesale Market Objectives.

Further information is available at: www.communityelectricity.net.au

Submission

Community welcomes the development of these solar plants. We note from the application that:

- i) The interim solution has been requested and is supported by WestGen as it believes it is the only alternative that provides an appropriate balance between connection reliability and cost to the solar farm projects.
- ii) Under the proposed runback scheme, the generation output will be runback (reduced) as required to prevent a pre-contingent overloading as well as a contingent (N-1) overloading in the network.
- iii) WestGen is a member of the Competing Applications Group (CAG) No. 81: South Country Generation (CAG 81).
- iv) Western Power has stated that there will be no impact on other network users, including the other members of CAG 81.
- v) Western Power is currently progressing a Network Constraint Tool (NCT) solution for CAG 81. WestGen is seeking to connect to the Western Power network prior to the NCT solution becoming available to connect all members of CAG 81.

Community attended the presentation on this matter made to the IMO's Market Advisory Committee on 3 December 2014.

Community would support the application **CONDITIONAL** on the IMO being satisfied that the Network Constraint Tool is fit for purpose and properly integrated with the

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Wholesale Electricity Market Balancing Market. In particular, we understand that in its current form the Network Constraint Tool is not properly developed and conflicts with the Wholesale Market Objectives. We understand that if the tool remains dysfunctional then other network users who are participants in the Balancing Merit Order could be adversely affected by the proposal.

Contact

For further information or comment, please contact:

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3 December 2014