



Landfill Gas and Power

Technical Rules
Electricity Access
Economic Regulation Authority
PO Box 8469
PERTH BC
WA 6849

7 November 2008

Dear Sir / Madam,

SUBMISSION ON WESTERN POWER'S REVISED TECHNICAL RULES

Thank you for the opportunity to comment on Western Power's proposed revised technical rules.

LGP is a member of The Technical Rules Committee (TRC) established by the ERA and chaired by the Office of Energy to assess the proposals and advise on their suitability. The TRC has established a Small Generators Working Group (SGWG) to assess the proposals as they pertain to generators below 10MW, and LGP is also a member of this group.

LGP proposes to present its position primarily via these two bodies, bearing in mind that the eventual reports are understood to contain any dissenting positions in the event of consensus not being achieved.

That said, as time is of the essence in achieving the proposed timelines, LGP wishes to take this formal opportunity to notify the ERA that it has for many years perceived the connection requirements for small generators to be unreasonably onerous and inconsistent with good industry practice and thereby a barrier to entry for small generators. While this theme was widely held by small generators in the initial review of the Technical Rules a few years ago, it has not yet been resolved and strong dissatisfaction is being expressed in the SGWG as part of that group's ongoing process.

LGP perceives that small generators have an important role to play in the new Wholesale Electricity Market and in mitigating the adverse economic and social impacts of climate change, generation capacity shortfall and summertime peak load growth. However, we also perceive that the sector has previously not been considered sufficiently important to warrant the allocation of the necessary resources to upgrade its accepted electricity practice. While LGP supports the proper maintenance of safety standards, we perceive that Western Australian practice may be out of harmony with comparable approaches

taken in Australia's eastern states, New Zealand and many European jurisdictions. We perceive that this has impeded the participation of small generators, and we are concerned that that if allowed to continue, it will impede the development of the renewable energy industry in Western Australia and the state's participation in the opportunities afforded by the increased mandatory renewable energy target.

LGP looks forward to continuing its participation in the TRC and the SGWG and would welcome and encourage close attention by the ERA to the views of the small generator community.

Yours sincerely

p.p GRAEME ALFORD
CHIEF EXECUTIVE OFFICER