



Our Ref: D06/49239

28 September 2006

Dr J Tamblyn
Australian Energy Market Commission
By email: submissions@aemc.gov.au

Dear Dr Tamblyn

**Re: Studland Bay Wind Farm Participant Derogation (Voltage Ride Through)
Rule Change Proposal**

Transend Networks Pty Ltd has reviewed the Rule change proposal as submitted and supports the rule change in principle given the short term nature of the derogation and the location of the generation. However Transend considers that a number of relatively minor changes are necessary to improve the operation of the derogation. Specifically these changes make explicit the negotiation of appropriate access standards, consistent with other negotiated generator performance provisions of the NER, and indeed the NEMMCO wind generation technical standards rule change proposal.

The suggested drafting changes, which have been discussed with the proponent, are as follows:

- (a) Until the expiry date, the requirement under clause S5.2.5.3(a)(2) of the Rules for generating units to be capable of continuous uninterrupted operation at voltages in excess of 110% of ~~nominal~~ normal voltage does not apply to generating units registered to Woolnorth Studland Bay Wind Farm Pty Ltd, provided that the total capacity of the generating units registered by Woolnorth Studland Bay Wind Farm Pty Ltd does not exceed 80MW.
- (b) Until the expiry date, the capability of each generating units-registered to Woolnorth Studland Bay Wind Farm Pty Ltd must be capable of to achieve continuous uninterrupted operation during the occurrence of power system voltages that do not exceed in excess of 110% of nominal normal voltage at the connection point will be negotiated and agreed with the relevant Network Service Provider.

Transend does not wish to delay the determination on this Rule change and believes that these minor changes do not constitute grounds for extending the consultation period.

If you have any queries in relation to this issue, please contact Chandra Kumble on ph: 0417 549 527 or by email: chandra.kumble@transend.com.au.

Yours sincerely

[by email]

Michael Green
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