

23 June 2006

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Dr John Tamblyn
Chairman
Australian Energy Market Commission
PO Box H166
Australia Square NSW 1215

Dear Dr Tamblyn,

Re: National Electricity Rule Amendment: Technical Standards for Wind Generation

Pacific Hydro, Australia's leading renewable energy developer, is committed to maximising Australia's renewable energy opportunities while supporting regional growth and the reduction of Australia's greenhouse gas emissions. To date Pacific Hydro has invested around \$500 million in the Australian renewable energy market, \$160 million of this in wind farm developments.

Being an owner of distribution-connected wind farms, Pacific Hydro has significant experience in the development, operation and management of wind farms and maintains strong working relationships with Powercor and the NSP, to whom the farms are connected.

As a company who recognises Australia's incredible wind resources and the opportunity they create for our energy future, Pacific Hydro welcomes the opportunity to comment on the proposed technical standard rule changes for wind farm developments

We applaud the clarification of the fault requirements for transmission connection Clause S5.2.5.3 C, however we are concerned with the increase in fault ride through requirements being placed on connection to distribution systems. Three phase faults in distribution systems of 66kV or 132kV are rare events, and the protection clearing times in these weak grid areas is usually very slow. The long clearing times of the distribution faults do not affect system stability, yet the additional requirement is likely to result in an excessive cost imposition being imposed on the smaller distribution wind farms which could impact their financial viability.

We acknowledge that the issues in distribution grids become more complex as additional projects connect into the networks, so we agree with the concept of 'considered projects' where there are likely generating system interactions.

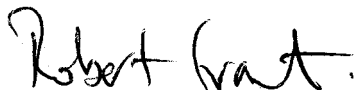
Pacific Hydro strongly supports the Auswind submission as it covers in detail most of the concerns from a wind industry perspective.

Lastly, we understand that a process is under way between the AER, the AEMC, NEMMCO and the NGF for a derogation to reopen the development of technical performance standards and compliance plans for plant existing at the performance standards commencement date. We have been concerned for some time with the current rules and have

had difficulty with the process for registering the performance standards of plant existing at the performance standards commencement date, so we support the derogation process.

Should you wish to discuss this further please contact Kate Summers on (03) 9615 6442 or via email on ksummers@pacifichydro.com.au.

Yours sincerely



Rob Grant
Chief Executive Officer