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24 November 2006

Dr John Tamblyn
Chairman
Australian Energy Market Commission
Level 16, 1 Market Street
SYDNEY NSW 2000

Email: submissions@aemc.gov.au

Dear Dr Tamblyn,

TECHNICAL STANDARDS FOR WIND GENERATION

Thank you for providing CitiPower and Powercor with the opportunity to comment on the Draft Decision for the proposed *National Electricity Rule (NER)* changes related to the technical standards for wind generation. As a network service provider servicing Western Victoria, the business has been involved in the connection of a number of wind generators. Typically wind generators, at least in Victoria, have chosen to connect to the distribution system rather than the transmission system. This trend is expected to continue and having some of the best wind locations in Australia, the business expects to receive many more requests for connection over the next few years. As a consequence CitiPower and Powercor have a particular interest in the proposed NER changes proposed by NEMMCO.

CitiPower and Powercor offer the following comments for your consideration.

4.1.4 Voltage

This section deals with concerns that generators may be required to deliver performance beyond that required of the distribution system. In support of the Commission's decision, CitiPower and Powercor wish to point out that the voltage variation allowed in Victoria for 66kV and for HV in rural areas is +/- 10% which is consistent with the range proposed by NEMMCO.

4.1.6 Partial load Rejection

Powercor agrees with the Commission's proposal to retain the current clause S5.2.5.4 to ensure the security of the power system.

4.1.8 Impact on network capability

Powercor agree that a cap of 5% of generating system capital to mitigate a negative impact has no firm basis.

It is important to note from the Powercor experience for connection of wind generation, the issue of a negative impact on the network and existing network users has been a critical factor in negotiations for the connection arrangement. The distribution network has been designed to connect customer load rather than generation.

[32] S5.2.5.8 Protection of generating units from power system disturbances

Clause (a) (2) refers to “*generating system*” but subclause (i)(A) and (B) refer to “the generating unit.” This is inconsistent and the latter reference should be to “*generating system*.” This is particularly relevant to wind-farms composed of large numbers of relatively small generating units.

[33] S5.2.6 Monitoring and Control Requirements

In the section S5.2.6.1 Remote Monitoring for clauses under Minimum access standard, the numbering of paragraphs has inconsistencies, for example, there are two S5.2.6.1(c)(1)’s.

If you wish to discuss further the matters raised by CitiPower and Powercor Australia in this submission, please do not hesitate to contact me on (03) 9683 4282.

Yours sincerely

Rolf Herrmann
Manager Regulation