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ENERGY RESPONSE Pty Ltd  
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DISTRIBUTION LOSS FACTOR CALCULATION  
FOR AMCOR GAWLER GLASS FACTORY  
ADDITION OF STAGE 3

I refer to your report titled Distribution Loss Factor Calculation Methodology for Amcor Gawler Glass Factory, Document Number EMB-DLF-GLR-02, Revision B and dated 20 January 2010.

This report concerns the requirement for Energy Response to determine a Distribution Loss Factor (DLF) for the Amcor Packaging (Australia) Pty Ltd internal distribution network as a part of the registration of Amcor's Gawler Glass Factory embedded generators as non-scheduled market generators in the National Electricity Market. These embedded generators are connected to the Amcor Packaging (Australia) exempt network within the Gawler plant. This report covers the operation with a new 3<sup>rd</sup> stage process and generator.

I have reviewed your report and I find that:

- i. The methodology used for the Distribution Loss Factor (DLF) calculation is appropriate.
- ii. The data obtained concerning the generation operating conditions and the distribution network for use in calculating the DLF is adequate for this purpose.
- iii. The calculated DLF figure has been correctly determined.

The methodology used is the same as that set out in the previous report "Distribution Loss Factor Calculation Methodology for Amcor Gawler Glass Factory", Document Number EMB-DLF-GLR-01, which covered the plant operation with 2 process stages and 2 generators.

The underlying methodology is taken from "Determination of Distribution Loss Factors for Embedded/Local Generators", Report NCM 17699, March 2007, prepared by Ergon Energy and Energex and approved by the Queensland Competition Authority. This methodology is appropriate for use in determining the DLF for the generation installed in the AMCOR Gawler Glass Factory internal distribution network.

The NSP connection point, internal network, generation connection point arrangement and generation operating regime complies with the models considered in report NCM 17699.

The data used for calculation is adequate and where specific network component parameters are not available from site, the estimated values used are sound. It is noted that the production based power consumption profile for the new stage (Stage 3) is not available yet as commissioning is just being completed. The profile for the established stages 1 and 2 has been used. This is appropriate as the 3<sup>rd</sup> stage is similar in design and capacity. Energy Response will revise the DLF calculation once recorded consumption data is available.

The calculated DLF given in report EMB-DLF-GLR-02, Revision B, is correctly determined according to the methodology and data and an independent load flow analysis substantiates this figure.

Yours sincerely



Bob Coulter

Principal Consultant

AusNet Utility Services Pty Ltd