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## Re: Transmission Annual Planning Report Guideline – Consultation Paper

Renew Estate and Wirsol are pleased to submit the below feedback on Australian Energy Regulator (AER's) Transmission Annual Planning Report (TAPR) Consultation Paper.

Renew Estate and Wirsol are project partners in developing large-scale solar farm projects across Australia. Wirsol, as the asset builder and asset owner, has committed an investment of over \$750m in 2017 developing a pipeline of utility scale solar PV projects across Australia. Wirsol is a substantial global renewable energy player. The partnership between Renew Estate and Wirsol was announced in July 2017 and is planning to develop 1 GW of renewable energy in Australia by 2020.

We welcome the additional information required for the Annual Planning Reports that is outlined in Section 4.1 to 4.3 of AER's Consultation paper and provide specific feedback on these points below. We believe this TAPR guideline can continue to improve the coordination between transmission network service providers (TNSPs) and generators and help lead to more efficient investment in our transmission and generation infrastructure leading to a lower cost to consumers and more reliable grid.

The current APR's are structured around load connections rather than generator connection; our view is that the TAPR's should provide advice on network capability and developments that would provide sufficient information that would allow generation connections and load connections to be treated on an equal basis i.e. the information would allow siting of new generator developments and load developments on an equal basis. We see the proposed additional information for the TAPRs in the consultation paper as a good step to enable this.

### **Section 4.1: Transmission Connection Point Data**

#### **Load Forecast**

- For what period is the peak demand required to be forecast into the future? Is this forecast only for the TAPR year or are future years forecast as well? We would recommend this time period is added to this section for clarity as per the historic load trace and would recommend that this is also forecast 10 years into the future. These forecasts should incorporate the planned infrastructure upgrades, committed generation construction and would allow long term planning for new generators and loads.

#### **Value of Customer Reliability**

- How will this value be calculated? Will that calculation process also be outlined within the TAPR for transparency and ease of understanding?

#### **Historic Primary Plant Ratings**

- The TNSP set rated per unit voltage should be included as part of this information



### **System Strength**

- Details of current strength at each substation should be provided to allow new generators sufficient information on areas of growing concern to the TNSP.

### **Section 4.2 Transmission Line**

#### **Historic Load Trace**

- How will this data be distributed? We would recommend that incorporating this data into an interactive web-based map (similar to Ergon's DAPR) would be the clearest way to present this information rather than a simple database with all the load trace files. We would also recommend that this data is free and publicly available.

### **Section 4.3 Emerging Constraints**

#### **Constraint Type and Driver**

- In addition to emerging constraints, we would add that another useful piece of information would be any existing system limitations at each connection point that are not based purely on equipment or line capacity, such as harmonics, voltage issues etc
- Where there are sections of the network in which the TNSP does not meet the technical requirements and obligations from Schedule 5.1 from the NER these should also be outlined as part of the TAPR document.

The combination of the plant ratings, conductor ratings and historic load trace information will greatly assist developers of new renewable energy projects in better understanding where there is network capacity for new projects. This will also assist TNSPs by cutting down on the number of frivolous or speculative preliminary connection applications and allow resources to be better focused on the projects that are committed to going ahead.

Yours faithfully,

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