



01 Sep 2020

Mr Peter Adams  
General Manager, Market Performance  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001

Lodged via email: [wholesaleperformance@aer.gov.au](mailto:wholesaleperformance@aer.gov.au)

**RE: UPDATE TO PROPOSED SEMI SCHEDULED GENERATOR RULE CHANGES**

Dear Mr Adams,

Tilt Renewables is a leading Australasian renewables developer engaged across all stages of project development through to operations. Tilt Renewables currently has 366 MW of operational wind farms across the NEM and New Zealand, plus a further 469 MW in construction/commissioning and over 3 GW in its development pipeline.

Tilt Renewables (TLT) appreciates that the Australian Energy Regulator has listened to stakeholder feedback and come to a proposed solution that more closely aligns with the scale of the identified issue.

In the AER's updated proposal, it states that "... [a semi scheduled generator's (SSG)] output may vary in accordance with their available resource and technical capability" and "This would operate in concert with the existing rules regarding the imposition of a semi dispatch cap during a semi dispatch interval, the deviation for the protection of plant or personnel and the provision of other system services." By doing so the revised preferred option limits the allowable reasons for a SSG to vary from its dispatch target rather than simply banning a direct (non-bidding/dispatch) response to price, which was TLT's preferred option detailed in its submission on 24/07/2020.

Due to the AER's direction with the updated proposal, TLT would like to highlight that there other sound technical reasons that a SSG may deviate from its dispatch instruction other than those highlighted above. For example, after a wind turbine generator (WTG) has been paused, it may take five to seven minutes for an active power response from the WTG, meaning that the wind farm will be off target for a reason other than a change in the resource.

Furthermore, as the AWEFS/ASEFS forecasts override the availability bid, a SSG is limited in its options to reduce its availability below its unconstrained intermittent generation forecast. This combined with the revised preferred option will likely have unintended implications, for example when a generator is ramping down for a network outage. Under the current rule settings, a SSG would be allowed to ignore its dispatch target and ramp down, with the dispatch target following the SSG's output. Under the revised preferred option, the SSG would only be able to deviate from its target due to a change in resource, and there is currently no appropriate way for the SSG to move its dispatch target down other than to bid out of the market through the price bands, which TLT doesn't consider as appropriate for the purposes of taking an outage.

TLT recommends that the AER consider all sound technical reasons that a SSG may be off its dispatch target and ensures that these are considered in the proposed rule change before it is finalised.



Tilt Renewables will be pleased to meet with you to discuss this submission in more detail and provide ongoing support through the consultation process. Please contact the undersigned or Rhys Albanese at [rhys.albanese@tiltrenewables.com](mailto:rhys.albanese@tiltrenewables.com) or 0423 423 797.

Regards,

A handwritten signature in blue ink that reads "Nigel Baker".

Nigel Baker

**Executive General Manager, Generation and Trading  
Tilt Renewables**