

02 December 2011



Economic Regulation Authority  
Attn: Tyson Self, Manager Projects Access  
Level 6, 197 St Georges Terrace  
PERTH WA 6000

Dear Tyson Self,

RE: Western Power's Proposed Revisions to the Access Arrangement for the Western Power Network

We welcome the opportunity to submit on Western Power's proposed revisions to its access arrangement for the Western Power Network relating to the third access arrangement period (AA3), the five year period from 1 July 2012 to 30 June 2017.

As a generation developer, Wind Prospect believes that an improved grid applications process is crucial to the successful development of new generation projects. Wind Prospect supports a move towards regulations similar to those under the *National Electricity Rules* governing operation of the National Electricity Market (NEM). In particular, Wind Prospect supports the proposed revisions to Applications and Queuing Process (AQP). The changes will be of crucial importance to Wind Prospect as a stakeholder with regards to our proposed Yandin and Waddi wind farms in the Shire of Dandaragan.

Wind Prospect can provide the following specific comments on the proposal:

#### Proposed Revisions to AQP

- The proposed revisions of the AQP by Western Power are a significant improvement than those that are currently in place.

#### Enquiry Stage

- Wind Prospect is encouraged to see the addition of a formal enquiry stage and supports this concept and welcomes the further revisions that address issues raised in the mid-period revisions proposal.
- However, the enquiry stage should be a free service, as it is in the NEM. We disagree to any provisions for a non-refundable fixed fee to be paid upon lodgement of an enquiry. The service should be similar to the enquiry stage service provided under the NEM, where no fee is charged and the response is valid for up to 3 months. If a non-fundable fixed fee is to be allowed, the fee should be explicitly stated within the AQP.

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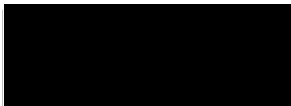
- The enquiry response letter to the applicant should be received within a maximum of 20 business days, rather than 40 business days. Information required for the response letter should be readily available and accessible avoiding the need for a long response time.

### Competing Applications Group

- Wind Prospect welcomes the further revisions that ensure greater details will be provided to applicants that are deemed to be part of a Competing Applications Group.
- However, we note there is currently no definition of a “preliminary offer processing fee”. This term should be clearly defined within the AQP and, if appropriate, the associated monetary value should also be clearly defined.

Wind Prospect supports the principle of the proposed AQP process and key elements such as an Enquiry Stage and Competing Applications Group. Wind Prospect welcomes the proposed revisions to the current Western Power AQP and strongly believes that such a process when properly implemented, regulated and operated will deliver benefits to all relevant stakeholders and to Western Australia’s economic state.

Yours sincerely



Oliver Scheidegger  
Development Manager

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