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30 November 2012

TransGrid and Powerlink

Via email: regulatory.consultation@transgrid.com.au

Submission on QNI Upgrade Project Specification Consultation Report

White Rock Wind Farm Pty Ltd (WRWF) welcomes the opportunity to comment on the Project Specification Consultation Report – Development of the Queensland NSW Interconnector (Consultation Report).

PowerLink and TransGrid identify a range of market benefits associated with the increase in capacity of the Queensland NSW Interconnector (QNI) in their Consultation Report. As part of their assessment, they plan to quantify these market benefits by undertaking market modeling that would be applied to a range of credible investment options and a number of different scenarios. All of the credible options examined will deliver market benefits by relieving constraints across the QNI interconnector.

Given the significant revision to the Queensland and NSW forecast demand as outlined in AEMO's latest Electricity Statement of Opportunities (ESOO), we consider that the quantum of market benefits identified in any analysis of an upgrade of QNI needs to be adjusted accordingly. We consider that the recent reduction of demand in the NEM is likely to materially change the economic justification for each of the QNI upgrade options.

The White Rock Wind Farm is located approximately 20km west of Glen Innes in northern NSW. The project received planning approval from the NSW Department of Planning and Infrastructure in July 2012. WRWF has commenced the grid connection process with TransGrid, including investigating a 330kV connection of the wind farm to the QNI at a point between Armidale and Dumaresq.

We understand that the connection of a wind farm to the QNI is likely to have an impact on the design of a number of the QNI Upgrade Credible Options identified in the Consultation Report, however we believe that there are a number of potential technical solutions that would enable the wind farm connection to proceed without impeding any future QNI Upgrade, should the economic justification of the QNI Upgrade be confirmed.

Yours sincerely

ANDREW WILSON

For White Rock Wind Farm Pty Ltd

Background

White Rock Wind Farm is owned by Epuron, a NSW-owned renewable energy developer. Established in 2003 as Taurus Energy it has gained planning approval for a number of wind farm developments in the State including: Snowy Plains, Cullerin Range, (built and owned by Origin Energy), Conroy's Gap, Gullen Range (under construction), Silverton (a joint venture with Macquarie Capital Wind Fund and now owned by AGL Energy) and White Rock.

Epuron has always believed in the potential for wind energy in NSW. We note that Cullerin Range is one of the highest-yielding wind projects in the NEM, achieving an average net capacity factor of over 40% since its commissioning in mid-2009.

Epuron has other projects within the NSW planning system at various stages of development, including wind energy projects known as Rye Park, Liverpool Range, Yass Valley and Birrema. Epuron is also progressing a number of smaller wind farm developments such as Eden Wind Farm through the local Council/Joint Regional Planning Panel approval process in NSW. All of these wind farm developments attract investment opportunity under the RET.

In addition to its wind activities, Epuron is completing the construction of solar (photovoltaic) power stations at three remote communities in the NT and is developing further solar and wind projects around Australia.

Epuron Solar is the owner of Australia's largest tracking solar PV plant – the 1MW Uterne Solar Station south of Alice Springs in the Northern Territory.