



John Pierce
Chairman
Australian Energy Market Commission
PO BOX A2449
Sydney South NSW 1235

20 February 2014

Dear Mr Pierce,

Re: FRV Submission on the ERC0147 Connecting Embedded Generation Rule Change Final Draft Determination

FRV is an international developer of large scale solar projects with experience in both solar thermal and photovoltaic technology. FRV has developed and built projects in Europe and the United States and currently has activities in Europe, Australia, Middle East, North and South Africa and Latin America.

FRV is involved in connecting large scale embedded generators to the National Electricity Market. Most notably, FRV is currently in the process of connecting a 20MW embedded generator in ACT and a 56MW embedded generator in NSW.

We have considerable experience in a variety of regulatory environments and have been successful within a number of different renewable energy support mechanisms.

Our recommendations regarding the ERC0147 final draft determination are as follows:

1. Clause 5.3.6(a2)(1) be deleted so there is no stop-the-clock provision for a DNSP to consult AEMO or a TNSP as recommended by section 2.4.3 of the Position Paper.
2. Schedule 5.4B(n) be amended such that the proposed option for a validity period mechanism be replaced with a mechanism where the DNSP writes to confirm the Connection Applicant's intention of proceeding with an Application for Connection 12 months after the Detailed Response to Enquiry has been provided, if the Connection Applicant has not already provided an Application for Connection during this time. In doing so the DNSP must confirm whether there have been any changes to the network that may affect the currency of the information contained in the Detailed Response to Enquiry.
3. Section 2.3.2, Ability for a DNSP and connection applicant to agree on a validity period, of the Position Paper to be amended to reflect the open-access arrangement of the NEM and clarify

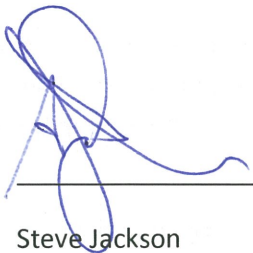
that DNSPs are not able to apportion network capacity as part of its response to connection enquiries.

4. Amendment to Schedule 5.4B, Detailed Response to Enquiry, to include options for connecting at more than one point in the network and reasons for preferred and rejected alternative options. This was discussed in the workshop of 17 October 2013 and is essentially a relocation of the existing provision under 5.3.6(e) from the Offer to Connect stage to the Detailed Response to Enquiry stage. This is also consistent with the recommendations under the Transmission Framework Review.

In addition to the recommendations above, FRV supports the submission being made by the Clean Energy Council.

We thank you for the opportunity to provide a submission. If you have any questions in relation to this submission please don't hesitate to contact Chris Wilson on 02 8257 4749 or chris.wilson@frv.com.

Yours sincerely,



Steve Jackson

Development Manager - Australia