Regulation Team

TransGrid

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

Improving Stability in South-Western New South Wales – Project Specification Consultation Report

Sunraysia Solar Farm Pty Ltd ("Sunraysia SF") welcomes the opportunity to provide feedback on the Project Specification Consultation Report for improving Stability in South-Western New South Wales (the "PSCR").

As a generator in south-west New South Wales affected by system stability issues, including the constraint imposed since May 2020 limiting power flows on line 63, we are very keen to understand in further detail of the options available for network improvements in the area. By the end of 2020, there is expected to be over 900 MW of generation connected in south-west NSW, with the line 63 constraint limiting exports to approximately 300 MW, leaving two thirds of maximum output unable to reach consumers. There is potential for further constraints to limit exports even further.

Given that the constrained generation is low-cost renewables, it represents a lost opportunity for consumers to benefit through lower electricity prices in NSW. And clearly for generators like us, it represents a potentially significant financial impact on a project, and one which was not foreseen (whether by Sunraysia SF, AEMO or TransGrid) at the time our project was committed.

At this stage Sunraysia SF does not have a view on the relative merits of the options identified by TransGrid in the PSCR or alternative solutions which may be developed through the RIT-T process. We await with interest the outcomes of the TransGrid modelling and look forward to engaging further with TransGrid and other stakeholders to determine the solution which best addresses the voltage collapse issue and resulting constraints whilst delivering overall net market benefits.

Given the potentially material impact of the constraint on low cost renewable generation in the region and the expected timeframe for the delivery of a network solution we would like to work with TransGrid, the Australian Energy Regulator ("AER") and other stakeholders to expedite this RIT-T process. Secondly, we are very interested in exploring possible interim solutions that can provide relief in the short and medium term, while a longer term solution is worked out through the RIT-T. If there is any way in which we can assist with the development of short and medium term options, please contact lain Pople on

Yours sincerely,

Duncan Jewell

Director

Sunraysia Solar Farm Pty Ltd

26/10/2020