
To whom it may concern,

Thank you for the opportunity for Pacific Hydro to provide feedback on Queensland Energy Legislation and for including Pacific Hydro in the generators workshop. Pacific Hydro has been developing and operating renewable energy projects in Australia for over 20 years and we are proud to have our first project in Queensland currently under construction. We would be happy to provide feedback of our experience to date in Queensland and where we can see opportunity for improvement.

Generation Authority Application

We are currently applying for a generator licence for the Haughton Solar Farm. Our application process is ongoing however we would like to offer the following feedback on the process:

- Template: there is currently no template available for a generator licence application and applicants are required to submit an application based on the National Electricity Rules (NER) and the provided guidelines which are open to interpretation. Pacific Hydro believes that a template has the potential to streamline this process and reduce interpretation error.

- Timeframe: No timeframes are advertised for the application process. No statutory timeframes exist for the consideration of a generation authority application. The Department aims to progress applications within four months however some applications may take longer depending on the complexity of issues raised. Pacific Hydro recommends that statutory timeframes are introduced to provide clarity and ensure the application process is expedited.

- Duplication of information: AEMO registration and generator licencing have a lot of overlapping information including but not limited to; organisational structure, procedures and process on risk management and regulatory compliance matters, project financing and costs, revenue model, external service providers, and contracts. Pacific Hydro queries whether this duplication is necessary and is open to solutions that could reduce this duplication.

- Confidentiality: at the time of submission, Pacific Hydro was advised that the Department would review the application. We have since been told that the application is being outsourced and reviewed by a confidential third party. Pacific Hydro have concerns around confidential information being provided to a third party and have requested that documents marked as confidential are not forwarded. There is no clarity as to whether this request has been executed.

- Advertising: Pacific Hydro is currently seeking clarification that confidential information will not be published as part of the public consultation process. We recommend that this be clearly stated.

In addition to the feedback above in relation to the generation authority application, Pacific Hydro has the following general feedback.
Pacific Hydro recommends that technical requirements for connection of a generator should follow national requirements and there shouldn’t be State based technical requirements. Our experience in South Australia with specific connection requirements as regulated by ESCOSA and OTR add time and cost to projects and have the potential to hinder investment.

Pacific Hydro recommends that energy storage technologies including but not limited to batteries, pumped hydro, concentrated solar thermal and compressed air energy storage are incorporated into the appropriate legislation including the Electricity Act 1994.

If you have any queries regarding the information within this submission or require further clarification please don’t hesitate to contact me. We welcome this process and appreciate the opportunity to provide feedback.

Regards,

Rachel Watson
General Manager, Australia
Pacific Hydro Australia

For enquiries regarding this letter, please contact:
Maja Barnett
Tel. [Redacted]