



Australian Government

Office of the National Wind Farm Commissioner

27 February 2018

Ms Audrey Zibelman
Chief Executive Officer
Australian Energy Market Operator
Level 22, 530 Collins Street
Melbourne VIC 3000
Via email: ISP@aemo.com.au

Dear Ms Zibelman

Re: Integrated System Plan Consultation Paper

The Office of the National Wind Farm Commissioner welcomes the opportunity to provide a submission to the Australian Energy Market Operator's (AEMO) Integrated System Plan (ISP) consultation paper.

The National Wind Farm Commissioner has a national, independent role and is responsible for:

- facilitating the handling of complaints from concerned community residents about planned and operating wind farms;
- identifying and promoting best practices for industry, government and related agencies to adopt with regard to the planning, operation and governance of wind farms; and
- improving information access and transparency about proposed and operating wind farms and the industry.

Our Office understands that the ISP consultation paper is intended to help identify particular needs to operate the power system reliably and securely into the future. The Office is pleased to note that AEMO is reviewing current and planned transmission infrastructure and energy development to ensure it is being developed in such a way that will allow new large scale renewable generation facilities to be connected in the most optimal locations for renewable resources.

Whilst our Office remains impartial to the view of the ISP as a basis for identification of new options for transmission infrastructure and generation sites, we note the importance of ensuring that any potential impacts to rural and regional communities are considered and that effective community consultation is promoted in developing any proposals and modelling related to the ISP.

In particular, from the Commissioner's experiences and learnings within the context of the wind industry, our Office considers that:

- there is a much higher likelihood of community issues and concerns to contend with when a proposed or operating wind farm is located near or amongst more populated areas;
- more populated areas correlate with the proximity and availability of transmission infrastructure, but can also result in a very large number of neighbours who will reside in close proximity to multiple turbines and other energy infrastructure (eg. transmission lines);

- locations for targeted zones should ideally be in locations further away from more populated areas, particularly given that existing and approved wind farms have most likely already selected optimal sites for their location based on the current grid structure;
- targeted zones may give rise to the potential for nearby residents or communities to be 'surrounded' by wind turbines and other infrastructure if multiple projects proceed, which could lead to a range of cumulative impacts to residents and communities;
- where multiple renewable energy projects and associated infrastructure are proposed within targeted zones, there should be consideration of how any potential negative impacts to nearby communities can be avoided or mitigated;
- there may be opportunities to prioritise proposed models and/or targeted zones which better balance the likelihood of acceptance of projects by the surrounding communities;
- there should be consideration of reconfiguring the potential targeted zones outlined in the consultation paper to avoid clustering of energy projects near communities (eg. transmission network could be designed to allow power stations to be more distributed and located in less populated areas);
- potential benefits to any nearby regional and rural communities from interconnected infrastructure and project developments should be encouraged; and
- approaches for interconnected infrastructure and project developments should consider criteria such as economic development and the ability to both support regional and industry development through improved local electricity supply and infrastructure in regional communities.

We would be pleased to meet with you and colleagues at a convenient time to discuss our views and provide any further detail. We have also attached a copy of the Commissioner's 2016 Annual Report to the Federal Parliament. In particular, we encourage you to read the observations and recommendations outlined on pages 15-35.

If you have any questions about this submission or would like any further information, you may contact us via email at nwfc@environment.gov.au or on our toll free number – 1800 656 395. We look forward to hearing from you.

Sincerely



Andrew Dyer
National Wind Farm Commissioner