

13/04/2018

Submissions
Climate Change Authority
GPO Box 787
Canberra ACT 2600

Dear Sir/Madam,

Review of the National Wind Farm Commissioner

Hydro Tasmania welcomes the opportunity to provide response to the Review of the National Wind Farm Commissioner.

Hydro Tasmania is Australia's largest producer of renewable energy, and is internationally recognised for its expertise in renewable energy operation and development, owning and operating approximately 2,500 MW of hydropower assets. Hydro Tasmania has been actively involved in the development of wind farm projects since the mid 1990's. Currently, Hydro Tasmania's joint venture company Woolnorth Wind Farms operates the Woolnorth, Studland Bay and Musselroe wind farms that have a combined generation capacity of over 300 MW. Hydro Tasmania is currently contracted to develop Woolnorth's Mt. Fyans Wind Farm in South West Victoria, and is also exploring opportunities to develop further renewable generation to serve the National Energy Market (NEM).

In recent times, the NEM has been undergoing a significant transformation, driven in part by the Renewable Energy Target. This transformation has seen a vast increase in the number of large-scale renewable energy developments entering the NEM. The National Wind Farm Commissioner has played an important role overseeing this transformation since 2015. Throughout this period, the Commissioner has proven an effective conduit between developers, communities and various levels of Government. Hydro Tasmania strongly supports the ongoing role of the National Wind Farm Commissioner.

Please see responses to the Review of the National Wind Farm Commissioner in attachment 1. If you would like further information on any aspect of this submission, please contact Colin Wain ((03) 8612 6443 or Colin.Wain@hydro.com.au).

Yours sincerely



Andrew Catchpole
Director Strategy & Market Development

Attachment 1 – Responses to Review of the National Wind Farm Commissioner

1. Have you interacted with the National Wind Farm Commissioner on a complaint about a proposed or operating wind farm? If so, please tell us about the nature of the complaint.

N/A

2. If you have interacted with the National Wind Farm Commissioner on a complaint about a proposed or operating wind farm, would you like to comment on how the complaint process was conducted?

N/A

3. The Terms of Reference for the National Wind Farm Commissioner say that the Commissioner will lead efforts to promote best practice, information availability and provide a central, trusted source for disseminating information. Do you have any comments on this aspect of the Commissioner's role?

Hydro Tasmania supports the work that has been undertaken by the Office of the National Wind Farm Commissioner in conjunction with the Independent Scientific Committee on Wind Turbines. During their tenure, the Commissioner has made significant efforts to promote best practice, information availability and provide a central, trusted source for disseminating information.

Hydro Tasmania believes the Commissioner has fulfilled the Terms of Reference. This has been achieved through developing a complaint handling process that provides an independent avenue for those impacted by wind farms that cannot reach a reasonable solution with wind farm developers or relevant authority.

The Commissioner has demonstrated a commitment to the promotion of best practice and the dissemination of information through the production of their Annual Report, wind farm site visits, representation at Industry events, and attendance at community meetings.

Hydro Tasmania has found the Commissioner effective in identifying key trends and developing appropriate frameworks for managing and alleviating grievances related to the development of wind farm projects. This has been accomplished by drawing upon the experiences of wind farm developers to provide insight and strategic direction to the broader wind sector. This insight and direction has been invaluable to the energy sector, and should persist going forward.

4. Do you think there is an ongoing need for the Commissioner? Do you see this changing in the future? If so, how?

Hydro Tasmania strongly supports the role of the National Wind Farm Commissioner, and believes there is sufficient justification for the role to be maintained going forward. Where appropriate, Hydro Tasmania also encourage further consideration be given to expanding and building upon the success of this role. This includes consideration of how the knowledge and experiences of the Commissioner can be leveraged to provide a more holistic and thorough service to promote best practice outcomes in the energy sector.

Engaging with affected stakeholders is an important factor in the development of wind farm projects. Hydro Tasmania believes that there is potential to promote joint solutions and engagement in regions where there are multiple developments under consideration.

For instance, in South West Victoria there are a number of projects being considered, or already in development. An orchestrated and collaborative engagement plan between developers in this region could ensure consistent and transparent engagement with relevant stakeholders, while reducing overall costs for developers. This will reduce the overall cost to consumers over the life of the project. Hydro Tasmania supports consideration being given to how the Commissioner's role could adapt to support this beneficial, collaborative process.

Further, Hydro Tasmania encourages consideration to enhance the role of the Commissioner in facilitating improved coordination within the industry as well as between industry and government in order to proactively respond to community concerns. Better coordination may be effective in reducing potential inefficiencies throughout the development process.

For example, in densely developed regions a large number of environmental studies have been conducted to consider impacts associated with wind farm developments. In South West Victoria, a variety of home range studies on Brolgas and their nesting and flocking sites have been carried out, as well as studies associated with endangered bats. Through the planning application stage, additional wind farm developments within the region could be provided access to leverage these existing studies along with their site specific study. This can better inform decision makers and provide real and valuable contribution to expanding knowledge on endangered species within the region.

Allowing the Commissioner to advocate that either industry or Government provide base information upfront can help determine target studies which need to be undertaken. This could reduce the cost and timeframe of the development, and realise the most efficient, low-cost and sustainable outcomes.

5. Do you think the Commissioner's scope, which is currently focused on proposed and operational wind farms is sufficient? Or should it be expanded to other large scale renewable energy projects, such as solar and storage?

Hydro Tasmania is supportive of initiatives that can assist in achieving effective stakeholder engagement and best practice outcomes in the renewable energy sector. Hydro Tasmania believes there is scope for the role of the National Wind Farm Commissioner to be expanded to include other large-scale renewable projects. This expansion is inclusive of large-scale solar and storage developments.

The Commissioner has played an important role in managing relations between wind developers and afflicted stakeholders. This valuable work ensures that the integrity of the wind sector is upheld, and has been integral to the promotion and achievement of industry best practice. Hydro Tasmania believes the experiences and knowledge acquired by the Commissioner throughout their tenure would, in many instances, be appropriately applied to other large-scale renewable projects. As such, Hydro Tasmania supports further consideration to expand the scope and role of the Commissioner to apply these experiences more broadly across the renewable energy sector.

6. The Office of the National Wind Farm Commissioner is funded from the Commonwealth budget at a cost of approximately \$676,000 per year. Do you think the Commissioner's office should continue to be funded in this way or should other funding models (like cost recovery from industry) be considered?

The independence of the Office of the National Wind Farm Commissioner is paramount to provide confidence in the dispute resolution process. Therefore, Hydro Tasmania advises against any change to funding arrangements that may be considered to jeopardise the independence of this office.