



4 May 2022

Our Ref: CWF-20220504

Mr Jai Thomas  
Acting Coordinator of Energy  
Energy Policy WA  
Level 1, 66 St Georges Terrace  
PERTH WA 6000

Dear Mr Thomas

**RE: ELECTRICITY GENERATION LICENCE EXEMPTION THRESHOLD**

Thank you for the opportunity to comment on the proposed increase to the threshold for application of the Electricity Generation Licence Exemption (the Exemption Threshold). Collgar Wind Farm (Collgar) does not support the proposed increase for the reasons outlined below.

Collgar applauds the previously announced intention to remove the requirement to hold a Generation Licence. Collgar agrees with Energy Policy WA's (EPWA) assessment that the costs of having to comply with a Generation Licence outweigh the benefits, and therefore there is no benefit to customers. Further, licence obligations duplicate those in other regulatory instruments adding to cost and regulatory burden.

EPWA has proposed to increase the Exemption Threshold as an interim arrangement to achieve the benefits of Generation Licence removal prior to the Parliamentary process being complete. However, this interim arrangement will only benefit the one or few Market Participants that construct a generation facility of between 30MW and 100MW during that time.

Collgar does not consider the proposed increase in Exemption Threshold to 100MW equitably applies the benefits of Generation Licence removal. It is unclear why it would be appropriate to exempt some generators from the regulatory burden and cost, but not others.

Collgar recommends that the powers conferred under section 8 of the *Electricity Industry Act 2004* are used to exempt all existing and future generation facilities from the requirement for a Generation Licence. Alternatively, the Exemption Threshold ought to be sufficiently high to not bind for any existing or new facilities (for example, 1GW).

This is in the public interest given, as EPWA notes, the requirement for a Generation Licence does not provide benefit to consumers but comes at a cost to Market Participants.

Thank you for your consideration of Collgar's submission.

Yours sincerely

REBECCA WHITE  
REGULATORY AND TRADING MANAGER