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Thomas Lozanov
Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

AEMC Ref: ERC0257

Email: Thomas.Lozanov@aemc.gov.au

Dear Mr Lozanov

National Electricity Amendment (Transparency of New Projects) Rule

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (MEA Group or Powershop) thanks the Australian Energy Market Commission (AEMC) for the opportunity to provide comments in response to the Transparency of New Projects proposed rule change (rule change) requested by the Australian Energy Market Operator (AEMO), Energy Networks Australia (ENA) and the Australian Energy Council (AEC).

The MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Mercer and Mt Millar wind farms. Subsequently, in early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation. We have also supplemented our asset portfolio by entering into a number of power purchase agreements with other renewable generators, and through this investment in new generation we have continued to support Australia's transition to renewable energy.

Powershop is an innovative retailer committed to providing lower prices for customers and which recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Over the last five years, Powershop has introduced numerous new, innovative and customer-centric initiatives into the Victorian market, including the first mobile app that allows customers to monitor their usage, a peer-to-peer solar trading trial and a successful consumer-led demand response program. Powershop has also been active in supporting community energy initiatives, including providing operational and market services for the community-owned Hepburn Wind Farm, supporting the Warburton hydro project, and funding a large range of community and social enterprise energy projects through our Your Community Energy program.

In principle MEA Group is supportive of the proposed changes to the consolidated rule change request. We expect that on balance the benefits of the change will improve outcomes for consumers and meet the requirements of the National Electricity Objective (NEO).

MEA Group agrees with AEMO's proposed changes and the rationale underpinning the rule change request. Broadening the definition of the intending network participant category is expected to lead to a more cohesive connection process that can be implemented by the relevant Network Service Providers (NSP). However, the MEA Group cautions the AEMC in relation to the proposed broadening of the definition to ensure that only the parties that are genuinely and actively progressing a connection application should be afforded the intending network participant status. Once it becomes evident the project is no longer being actively progressed, this status should be removed. MEA Group also agrees that confidentiality requirements should be strengthened and enforced to discourage any unlawful use of confidential information.

MEA Group also supports the AECs proposal to address the gaps in information and currency of that information provided to AEMO via the generation information page. MEA Group expects the benefits of this proposal to be immediate and tangible for all parties seeking to connect to the network, particularly in areas of congestion.

MEA Group supports the proposal by the ENA to publish and release the proponent name, size, location, completion date, primary technology and functional information regarding a connection enquiry or connection application. This information whilst providing significant insight into a connection applicant's project is not so commercially sensitive that it should be prevented from becoming available to other intending network participants.

MEA Group foresees that this rule change will lead to overall efficiencies in the network and the design of optimised connection solutions. The rule change should also reduce ad-hoc solutions whereby each generator is responsible for its own system strength remediation works, leading to inefficient outcomes and the potential overbuild of system strength remediation works for each generator. We support the proposed timing for the publication of this information being at the stage of a generator submitting a connection enquiry or connection application.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,



Ed McManus
Chief Executive Officer
Powershop Australia Pty Ltd
Meridian Energy Australia