



Meridian Energy Australia Pty Ltd
Level 15, 357 Collins Street
Melbourne VIC 3000

12 September 2019

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

Reference: ERC0257

Dear Mr Lozanov

Enhancing information on new generation projects to support least-cost investment

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 on the AEMC's Enhancing information on new generation projects to support least-cost investment draft rule (the Rule).

Background on the MEA Group

MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Millar Wind Farm in South Australia, followed by the Mt Mercer Wind Farm in Victoria. In early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation. We have 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 a number of significant, 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 customer-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.

MEA Group supports the draft Rule and its proposed changes which we expect will allow greater coordination between developers and generation owners during the complex grid connection negotiation phase of their development program. MEA Group is generally supportive of asset developers being provided with access to generator's models in order to allow them to undertake steady state modelling scenarios. MEA Group also notes the confidentiality provisions that will be in place to protect suppliers' proprietary software and intellectual property.

MEA Group notes that asset sale developers will only be a deemed participant for specific clauses such as 3.13.3(k) of the National Electricity Rules rather than enjoy all the rights and obligations of a fully registered participant.

MEA Group would encourage the AEMC to ensure that this limited category of registered participant is captured in the Australian Energy Market Operator's (AEMO) annual audit of its Registered Participants.

We would encourage the AEMC to investigate whether there was any capacity for the Rule to incorporate existing connection applications, in order to have an immediate effect on the congestion and transparency issues facing generators today.

Finally, MEA Group notes and supports the generator information page being updated on at least a quarterly basis by AEMO, following the implementation of this Rule (i.e. not any less frequently).

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

Yours sincerely,

A handwritten signature in blue ink that reads "Angus Holcombe".

Angus Holcombe
Head of Asset Development
Powershop Australia Pty Ltd
Meridian Energy Australia