

3 September 2026

Ms Anna Collyer,
Chair
Australian Energy Market Commission
Level 15, 60 Castlereagh Street,
Sydney NSW 2000

Dear Ms Collyer

Discussion Paper: Review of the Integrated System Plan Framework

Tilt Renewables welcomes the opportunity to provide feedback on the [Review of the Integrated System Plan \(ISP\) Framework Discussion Paper](#) (Discussion Paper). The ISP plays a critical role in supporting coordinated, transparent and least-cost planning across the National Electricity Market (NEM), and provides an important reference point for governments, investors, network businesses and market participants. Tilt Renewables considers the ISP to be a valuable and necessary national planning framework for identifying least-cost development pathways and coordinating investment across the NEM.

Tilt Renewables is one of Australia's largest developers, owners and operators of renewable energy projects. We currently operate 1.9 GW of wind, solar and battery storage assets across Australia, with a further 396 MW under construction and a development pipeline exceeding 6 GW. As a long-term investor in generation and storage, Tilt relies on credible system planning and timely transmission delivery to inform project location, sequencing and investment decisions.

Tilt Renewables broadly supports the Clean Energy Council's (CEC) submission, including its support for Strawperson 3, broader whole-of-system planning, improved treatment of delivery risk and a more timely transmission delivery pathway. Consistent with that broader position, this submission focuses on four issues that we consider particularly important from the perspective of long-term generation and storage investors:

- Timely transmission delivery and investor certainty
- Stronger coordination between national and jurisdictional pathways
- Open, testable and decision-useful ISP modelling, and
- Targeted broader actionability for strategically significant investments.

Of particular importance is the need for stronger coordination between national planning outcomes and jurisdictional delivery decisions where those decisions have material NEM-wide consequences.

Each of these matters is discussed in sections 1 to 4 below.

1. Timely transmission delivery and investor certainty

The ISP plays an important role in identifying the least-cost development pathway for the NEM. However, its value ultimately depends on the timely and predictable delivery of the transmission infrastructure needed to support generation, storage and major load investment. Generation and storage projects cannot make efficient decisions about project location, contracting or final investment if the transmission required to connect them is repeatedly delayed or subject to uncertain sequencing.

We therefore support SP3's focus on a more timely national pathway and consider this should translate into reforms that:

- Reduce unnecessary duplication between the ISP and the Regulatory Investment Test for Transmission (RIT-T)
- Better align the timing, information and assessment requirements applying across the ISP, RIT-T and feedback loop
- Allow project-specific assessment to reflect material new information without unnecessarily restarting established processes, and
- Provide clear milestones and delivery visibility so investors can understand the credible pathway for projects identified in the Optimal Development Path (ODP).

The objective should be a transmission assessment and delivery framework that maintains confidence in least-cost outcomes while reducing unnecessary delay and uncertainty.

Faster and more predictable transmission delivery would strengthen investor confidence and improve the likelihood that ISP outcomes translate into timely generation, storage and major load investment decisions. Ultimately, the value of the ISP depends not only on identifying an optimal development pathway but also on establishing a credible pathway for delivery.

2. Stronger coordination between national and jurisdictional pathways

The ISP plays a critical role in providing a coordinated, NEM-wide outlook to guide transmission and investment decisions. Its effectiveness as a long-term investment signal could be strengthened through greater continuity and coordination between national planning processes and jurisdictional delivery frameworks.

While the ISP identifies infrastructure required to support the long-term development of the NEM, its delivery is increasingly influenced by separate jurisdictional planning, regulatory and policy processes.

A lack of continuity between these processes can reduce the effectiveness of the ISP as a long-term investment signal. Generation, storage and major load investors rely on the ISP to inform decisions with investment horizons extending well beyond a decade. Where nationally significant transmission projects identified through the ISP are subsequently delayed, altered or reconsidered through jurisdiction-specific processes, uncertainty increases for investors and confidence in the published transmission outlook is weakened.

Recent developments relating to VNI West highlight this challenge. Irrespective of the merits of any particular project or policy position, the example demonstrates how subsequent jurisdictional decisions to delay, reconsider or alter nationally significant transmission projects can create uncertainty for generation, storage and major load investments planned in reliance on the ISP's published transmission outlook. This can reduce confidence that projects identified through the ISP will proceed broadly in accordance with the published pathway, notwithstanding that related investment decisions may be taken many years before the underlying transmission infrastructure is delivered.

We therefore consider that the effectiveness of SP3 would be strengthened by greater national coordination, continuity and transparency arrangements for transmission projects that deliver material NEM-wide benefits. Where a major inter-regional project has been identified through the ISP and progressed through defined assessment milestones, any proposal to materially delay, replace or discontinue that project should be supported by a transparent assessment of:

- Power system reliability and security implications
- Whole-of-system and consumer cost impacts
- The credibility, timing and cost of the alternative pathway
- Impacts on generation, storage and major load investments that rely on the published transmission outlook, and
- Implications for other jurisdictions and inter-regional transfer capability.

This is not intended to displace jurisdictional responsibilities. Under the Federation, jurisdictions have a central role in planning, approval and delivery decisions. However, where those decisions have material consequences beyond a single jurisdiction, there should be greater transparency regarding the NEM-wide consequences and trade-offs.

Strengthening national coordination in this way would improve investor confidence, enhance the durability of the ISP as a planning framework, and provide greater transparency regarding alternative transmission development pathways.

3. Open, testable and decision-useful ISP modelling

The ISP plays an important role in identifying the least-cost development pathway for the NEM. As the energy system becomes increasingly complex, open and testable models will be critical to supporting independent validation, improving confidence in ISP conclusions and enabling stakeholders to make informed investment decisions.

Our experience developing the Outback Energy proposal illustrates the importance of this issue. The proposal seeks to demonstrate whole-of-system benefits when compared with alternative generation and transmission pathways. In undertaking comparative analysis, we have relied on publicly available information. However, where modelling outcomes differ, it can be difficult to understand the factors driving those differences, independently validate the results or determine how competing evidence has been assessed.

For project proponents and investors, confidence in ISP outcomes depends not only on the quality of the modelling itself, but on the ability to understand, test and validate the conclusions that emerge from it.

We therefore support an open modelling framework under which AEMO provides:

- Greater transparency of the modelling methodologies used to assess and compare development pathways
- Sufficient information to enable informed independent review and validation of modelling results
- The ability for stakeholders to test and interrogate modelling outcomes, and
- Modelling outputs that allow pathway assessments and conclusions to be more readily understood and reproduced.

This would enable stakeholders to better understand, test and validate ISP outcomes, strengthening confidence in the resulting development pathways and their use in investment decision-making.

4. Targeted broader actionability for strategically significant investments

Tilt Renewables supports SP3 as the preferred overall framework. However, there may be merit in applying a targeted element of SP4 where distribution-connected investments or associated network augmentations have strategic or NEM-wide significance.

This may be particularly relevant where large new loads, including data centres, connect to distribution networks but require material augmentation that influences transmission development, generation and storage investment decisions, and broader system outcomes.

We therefore consider that broader actionability should be available only where an investment or associated augmentation is of sufficient scale or significance to affect NEM-wide outcomes, and coordinated planning would deliver demonstrable whole-of-system benefits.

Any extension of actionability should be subject to a clear materiality threshold and limited to investments that materially facilitate generation, storage or major load growth, or otherwise deliver demonstrable whole-of-system benefits.

A targeted approach would improve coordination where investment decisions have consequences beyond the distribution network, while supporting integrated planning of strategically significant infrastructure without expanding the ISP into routine distribution investment.

5. Closing

Tilt Renewables considers the ISP to be an important foundation for coordinated investment across the NEM. We support the continued evolution of the ISP to strengthen investor



confidence, improve the coordination of nationally significant infrastructure and help translate long-term planning into investable and deliverable outcomes, supporting a reliable, secure and affordable transition to a low-emissions electricity system.

We appreciate the opportunity to provide feedback on the Discussion Paper and look forward to continuing to work with the AEMC, AEMO and other stakeholders as this review progresses. Should you wish to discuss any of the matters raised in this submission, please do not hesitate to contact me at stephanie.mcdougall@tiltrenewables.com or 0477 701 873.

Yours sincerely

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