



9 October 2014

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235
By online submission.

Re: ERC0165 National Electricity Amendment (Generator ramp rates and dispatch inflexibility in bidding)

Dear Commissioners:

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Infigen Energy appreciates the opportunity to make a submission to the Australian Market Commission (AEMC) regarding the National Electricity Amendment (Generator ramp rates and dispatch inflexibility in bidding) draft determination.

Infigen Energy (ASX: IFN) is Australia's leading specialist renewable energy business. Infigen Energy is the largest owner of wind energy facilities in Australia where it owns and operates six major wind farms capable of producing approximately 1600 GWh per annum, or enough energy to supply over 200,000 Australian homes. Infigen Energy also has a significant pipeline of solar and wind development opportunities in Australia. In addition, Infigen Energy owns and operates a U.S. wind energy business taking its aggregate wind energy interests to 24 wind farms with a total generation capacity of over 1600 MW.

Infigen Energy shares the Commission's concerns that the AER's proposed rule, requiring the generators to dynamically provide their maximum technical ramp rate at all times would be difficult to apply in practice. It would increase the compliance burden on generators and would not be necessary to provide AEMO the ability to efficiently manage the energy market.

The draft rule proposed by the Commission is consistent with the AER's intent. It will further contribute to the achievement of the National Electricity Objective (NEO) through the requirement of a consistent and proportional level of ramp rate bidding regardless of generator size and plant configuration. This will deliver more efficient wholesale market outcomes and ensure that the regulatory framework does not unduly influence investment decisions towards one technology type or size over others.

In conclusion, Infigen Energy supports the draft rule put forward by the Commission and the rationale behind the draft determination in regards to generator ramp rates and dispatch inflexibility in bidding.

Yours sincerely,

Igor Brandao
Manager, Operation and Control Centre