



12th August 2013

Mr John Pierce
Chairman
Australian Energy Market Commission
PO BOX A2449
Sydney South NSW 1235
Lodged electronically

Dear Mr Pierce,

Attention: Submission - ERC0147 Connecting Embedded Generation Rule Change Consultation Draft Determination

Recurrent Energy is a major solar developer based in North America with significant capability and track record in developing and building solar photovoltaic plants and contributing to solar policy development. We have commissioned more than 200MW of capacity to date and we are in the process of building another 600MW of projects over the next 3 years. We have been operating in Australia from our Sydney office for more than two years. We have a number of projects under development including 3 in ACT; 4 in NSW and 6 in Queensland which will connect to distribution networks.

Our recommendation reflects the concerns of other large scale solar developers in this market. The rule change request contemplated embedded generators with a capacity of 10kW to 30MW, therefore we believe that the draft rule is only appropriate for non-registered embedded generators and should seek to make changes to Chapter 5A of the Rules, not Chapter 5.

We also support CEC's submission on this proposed rule change. Please contact me if you require further information.

Yours sincerely,

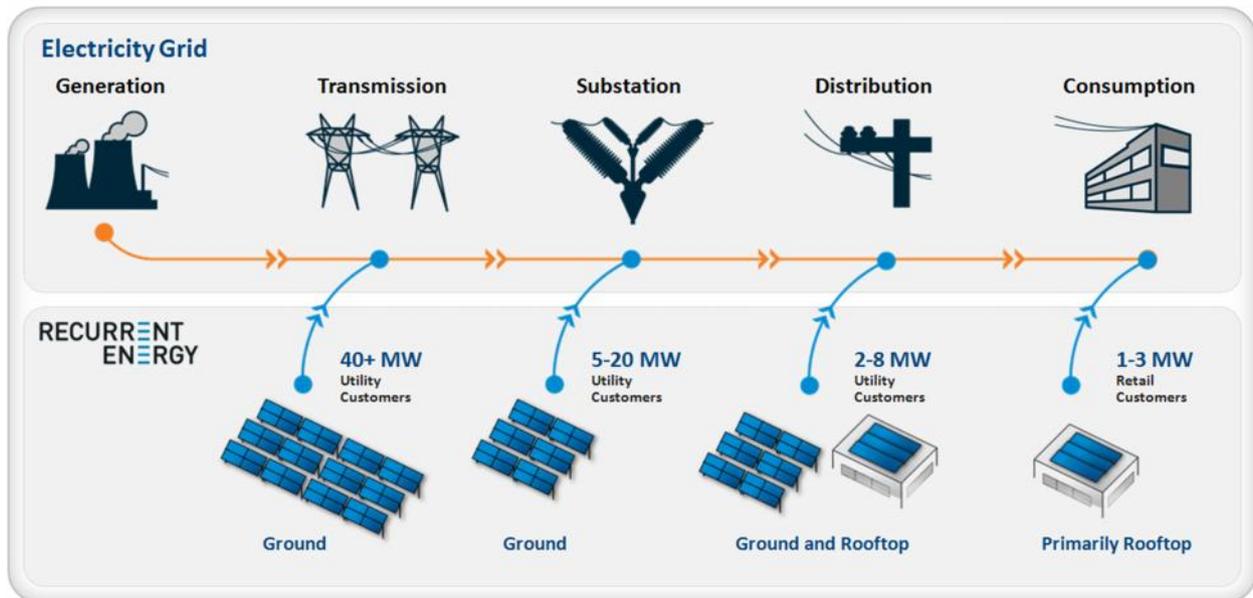
A handwritten signature in black ink that reads "Colin Liebmann".

Colin Liebmann
Acting Vice President, Australasia

About Recurrent Energy

Recurrent Energy is a leading solar project developer and generating company providing clean electricity to utilities, government, and commercial customers. Headquartered in San Francisco, Recurrent Energy is helping to meet rising energy demand by developing a global portfolio of clean power plants located where they are needed most.

Recurrent Energy & the Electricity Grid



The Company's vision is to use proven solar technology to meet rising energy demand with a fleet of clean power plants with project sizes ranging from 2-40+MW. With a project pipeline of 2.4 GW, and over 500 MW under contract, the company is well on its way to achieving that vision. Recurrent Energy is a U.S. subsidiary of Sharp Corporation of Japan and the primary development company for Sharp worldwide.

Value Proposition

Recurrent Energy's value proposition is in four main areas:

The Distributed Power Advantage:

Recurrent Energy has successfully differentiated itself through its market entry strategy focused on distributed-scale projects, 2 MW - 40 MW solar generating plants that are connected to existing utility distribution networks in areas of high demand. Distributed-scale projects are faster to interconnect and faster to permit. The net result is that the Company can deliver the benefits of solar sooner, an important selling point to utilities and regulators.

Focus on Viability:

Recurrent Energy's disciplined approach to project development and vigilant scrutiny of project viability has proved a successful point of differentiation against competitors. Our team spends time and development dollars early in the project lifecycle to evaluate site conditions and to advance the interconnection and permitting process. This heightened level of diligence ensures we are providing the most achievable sites, timelines, and pricing to our counterparties to meet their procurement needs.

Competitive Pricing:

Recurrent Energy differentiates itself from competitors in offering distributed-scale projects for large-scale economics. Recurrent Energy can achieve significant economies of scale in the larger procurement process given supplier interest in participating across the entirety of Recurrent Energy's contracted projects and 2.4 GW development pipeline. In addition, our focus on highly viable sites close to electricity loads and grid infrastructure allows us to deliver projects of premium benefit and minimal cost to customers. Finally, strong EPC, module supplier, government, and permitting relationships further streamline our development process and drive customer pricing downward.

Financial Strength:

Recurrent Energy is a U.S. subsidiary of Sharp Corporation of Japan. Together, Recurrent Energy and Sharp finance solar projects through a global network of project lenders and equity investors. Our Company's technical capabilities combined with its access to capital enables Recurrent Energy to deliver solar generating plants at just about any scale. The end result has been a series of successful project-specific financings that are structured with the most efficient use of debt, equity and tax benefits available in the market.

Australian Operation

Recurrent Energy has been assessing opportunities and developing projects in Australia since early 2010. Our parent company, Sharp, has conducted business in Australia for a number of decades. We employ industry professionals to assist with expediting projects as required.

We are pleased to be one of the first international solar PV developers to establish a base in Australia. With our parent support and experienced renewable energy staff, we are looking to become a leader in the Australian market.