



The Australian Energy Market Commission (AEMC)

Via AEMC website, reference ERC0251

16 January 2020

Re: Tilt Renewables response to the AEMC's Draft Rule Determination of 14 November 2019

Tilt Renewables is a leading Australasian renewable energy owner, operator and developer with a total operating asset base of 367MW across Australia and New Zealand, as well as having a further 469MW under construction across two large wind farms. Currently 505MW of Tilt Renewables' assets are in the NEM (including the 336MW Dundonnell Wind Farm in VIC, currently under construction) and the company has a development pipeline in Australia including wind, solar and storage of over 2,500MW. Tilt Renewables and its majority shareholder Infratil have significant expertise as investors and advisers in the design of electricity and clean energy markets in other jurisdictions including the United States, New Zealand, United Kingdom, and Western Australia.

Tilt Renewables supports the AEMC's draft rule determination contained in the report of 14th November 2019, including the rejection of the "average loss factor" approach and the pragmatic changes to assist AEMO's calculations of marginal loss factors.

Tilt Renewables does however encourage a considered long-term approach to the treatment of transmission losses in the NEM in the context of broader regulatory review processes, including consideration of the market and consumer benefits of generation investment certainty, and the potential for adverse impacts on existing generators from the subsequent investment decisions of others.

If you wish to discuss any aspect of our submission further, please contact the undersigned.

Regards,

A handwritten signature in black ink that reads "Nigel Baker".

Nigel Baker
Executive General Manager – Generation & Trading

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