



31 October 2023

David Hatfield
Director, Competition Exemptions
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

Lodged online at: [MEAD Submission Request for Application · ACCC](#)

Re: Submission in response to the **Draft Determination Application for authorisation AA1000643 lodged by AEMO in respect of coordination and information sharing for the purpose of scheduling System Works in the National Electricity Market**

Dear Mr Hatfield:

Tilt Renewables welcomes the opportunity to make a submission to the above Draft Determination.

Tilt Renewables is committed to continue playing a lead role in accelerating Australia's transition to clean energy. Tilt is one of the largest owners and operators of wind and solar generation in Australia with 1.7 GW of renewable generation capacity across ten operating (or under construction) wind and solar farms. In addition, Tilt Renewables has a development pipeline of over 5.0 GW of wind, solar and storage projects.

Tilt Renewables considers that the Public Benefits clearly exceed the demonstrated, or potential, Public Detriment and that the ACCC should reconsider their Draft Determination.

Scheduled network outages are a necessary part of an electricity network as maintenance of transmission assets is necessary to maintain high availability of the network--- particularly during periods of peak energy demand. However, this maintenance often has detrimental impacts on market generators, and customers, which should be effectively and efficiently managed. In our experience, the meetings that have occurred under the interim authorisation have been useful in mitigating the negative impacts of these necessary network outages.

Outage schedules are changing fast, and these meetings provide an efficient and effective means to notify market participants of recent changes. This is important as generators will often schedule generator maintenance coincident with the network being unavailable to later maximise generator availability during periods of high demand and high prices--- thereby reducing costs to consumers. These meetings facilitated such coordination which benefits generators while also being a significant benefit to electricity consumers.

AEMO makes a similar point in the Draft Determination Paper,

"AEMO submits that if outages associated with System Works occur in an uncoordinated way there is a very significant risk of insufficient electricity being available to meet demand and/or adverse impacts on wholesale electricity prices during the periods in which outages are occurring" (p. 16).



Improved system reliability and lower wholesale electricity prices would appear to be a very substantial Public Benefit.

Tilt Renewables notes that the Draft Determination does not state any Public Detriments have occurred during the period of the Interim Authorisation despite the ACCC having a legal representative present at the meetings. The meetings are open to all market participants, so there is no ability for companies to gain an unfair competitive advantage by excluding competitors. The ACCC states that AEMO could instead hold bilateral discussions with each of the many participants of the meeting. AEMO does not have infinite resources to conduct so many 1 on 1 meetings in a timely fashion and, in what order would AEMO hold such bilateral discussions? A company contacted a few days ahead of another company could gain an advantage over a competitor which is not possible should the Proposed Conduct continue as all companies learn of outage schedule changes at the same time. The meetings have resulted in at least one ill-advised outage being rescheduled after meeting participants raised concerns about sufficient generation being available. Such a result would be unlikely to occur in bilateral meetings which is another Public Benefit of the Proposed Conduct.

Therefore, in light of clear Public Benefits, and a lack of any evidence of Public Detriments, Tilt Renewables respectfully requests that the Proposed Conduct be Authorised.

Thank you for the opportunity to comment on the Draft Determination. Please feel free to contact jonathan.upson@tiltrenewables.com should you have any questions or wish to discuss any aspect of this submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Jon Upson".

Jonathan Upson

Head of Policy & Regulatory Affairs

Tilt Renewables