



28 August 2020

Ms Audrey Zibelman
CEO and Managing Director
Australian Energy Market Operator

Lodged by email: stakeholderrelations@aemo.com.au

RE: RENEWING AEMO'S ENGAGEMENT MODEL CONSULTATION

Dear Ms Zibelman,

Tilt Renewables is a leading Australasian renewables developer engaged across all stages of project development through to operations. Tilt Renewables currently has 366 MW of operational wind farms across the NEM and New Zealand, plus a further 469 MW in construction/commissioning and over 3 GW in its development pipeline.

Tilt Renewables (TLT) welcomes the opportunity to provide feedback on the Australian Energy Market Operator's (AEMO's) consultation paper in relation to renewing AEMO's engagement model. TLT appreciates AEMO's interest in improving its stakeholder engagement.

TLT considers the statement in the consultation paper that "*...participants are now vertically integrated across electricity, gas, wholesale, and retail*" as a generalisation which does not account for the still significant number of participants who focus their efforts solely on wholesale or retail, electricity or gas. In addition, AEMO's proposed option 3 in particular appears quite complex and prone to being burdened with significant bureaucracy. Whilst comprehensive on paper, we are concerned these structures may create significant impediments to participation and/or additional resource requirements across industry, particularly for small and medium sized participants, as well as risking reduced flexibility for the prioritisation of key issues and genuine and proactive consultation with relevant participants as priorities for the NEM inevitably evolve over time. We note that option 3 also includes an invitation only CEO roundtable and limited membership executive advisory panels, which may result in biased outcomes and a lack of transparency.

TLT considers both options 1 and 2 as workable solutions. With regards to option 1, TLT appreciates that some forums and working groups exist because of National Electricity Rules that were written some time ago and may no longer be fit for purpose. It is suggested that where this is the case, AEMO seek rule amendments to cease industry forums and working groups that are failing to drive valuable outcomes. In any restructuring of the participant industries and forums, TLT considers that AEMO should consider and prioritise the current needs of the system and ensure that consultation processes are agile enough to adapt to changing priorities.

In terms of determining how forums and working groups should be structured, TLT considers that separation in terms of technologies (electricity and gas) and markets (wholesale and retail) should remain. This will ensure that industry participant representatives can efficiently contribute in their areas of expertise and in relevant discussions for the business that they represent. AEMO's suggested split of operations, planning, markets, and Western Australia also seems reasonable in achieving these outcomes, however without the unnecessary added layer of strategic, transient and functional.



Tilt Renewables will be pleased to meet with you to discuss this submission in more detail and provide ongoing support through the consultation process. Please contact the undersigned or Rhys Albanese at rhys.albanese@tiltrenewables.com or 0423 423 797.

Regards,

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

Nigel Baker

**Executive General Manager, Generation and Trading
Tilt Renewables**