

8 February 2024

Ms Anna Collyer  
Chair  
Australian Energy Market AEMC  
Sydney South NSW 1235

By online submission

Dear Ms. Collyer,

**Accommodating financeability in the regulatory framework (ERC0348)**

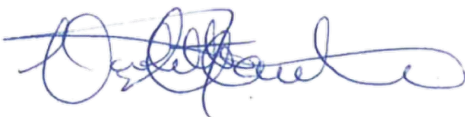
The Australian Energy Market Operator (AEMO) welcomes the opportunity to comment on the AEMC's proposed rule change on Accommodating financeability in the regulatory framework.

AEMO supports the proposed approach to provide the AER with the explicit ability to vary the depreciation profile for actionable ISP projects to address financeability challenges, where it considers this would better meet the National Electricity Objective (NEO).

The draft determination poses one question relating to the scope of concessional finance agreements that are to be taken into account in a financeability test. AEMO considers that all concessional finance agreements between the Transmission Network Service Provider and the Government Funding Body should be taken into consideration when applying the financeability test.

If you would like to discuss anything further, please contact Kevin Ly, AEMO Group Manager – Reform Development & Insights ([kevin.ly@aemo.com.au](mailto:kevin.ly@aemo.com.au)).

Yours sincerely,



Violette Mouchaileh  
**Executive General Manager – Reform Delivery**