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May 6, 2024

Benn Barr
CEO
Australian Energy Market Commission
Level 15
60 Castlereagh Street
Sydney, NSW 2000

Lodged via AEMC Website

Re: **Submission to the AEMC's Transmission access reform Consultation Paper**

Dear Benn:

Tilt Renewables welcomes the opportunity to make a submission to the above Consultation Paper as part of our continuing engagement with the AEMC.

Tilt Renewables is committed to continue playing a lead role in accelerating Australia's transition to clean energy. Tilt Renewables 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 wind and solar farms as well as storage. In addition, Tilt Renewables has a development pipeline of over 5.0 MW of wind, solar and storage projects.

Our submission consists of this Cover Letter as well as the attached completed submission template which addresses the paper's questions and other issues in detail.

Executive Summary

Priority Access

- Once implemented, Priority Access will not achieve the AEMC's stated objective of establishing "a level playing field that balances investor risk with the continued promotion of new entry..."
    - Rather, new investment will come to a standstill due to the increased risk, and uncertainty, caused by new developments having lower level access than 500+ grandfathered generators with the highest level of access.
    - New developments will wear most, and more likely all, of the incremental curtailment caused by network outages and new constraints which is inequitable and adds significant, unpredictable additional risks for investors.

- Modelling undertaken to date has shown that for one third of the cases modelled, Priority Access increased wholesale electricity prices and/or operated in a perverse manner increasing curtailment of the highest priority generators.
    - Implementing a model with such flaws cannot be supported

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Congestion Relief Market

- There has only been the most preliminary modelling of how the CRM would operate and that was done with some unrealistic inputs.
    - Very few, if any, people understand how the CRM would actually operate
    - Unintended serious consequences and potential gaming of the new market will be very likely
- The CRM aims to enable thermal generators who may (or may not) have actually wanted to be dispatched, to be paid not to be dispatched
    - This is an undesirable outcome for consumers and could extend the life of thermal generators
- The vast majority of PPAs in force at the time the CRM comes into effect will be opened up to complicated and expensive renegotiations
    - Negotiating new PPAs will also be more complicated and difficult once a decision to implement the CRM is made

Tilt Renewables considers there are other options to provide more effective locational signals in the NEM and reduce congestion without risky disruptions caused by a new mechanism and an entirely new market being imposed on the NEM. One of these options is to provide 'real' Enhanced Information including forecasting of headroom at nodes in the NEM. Another is focussing on addressing 'black spots' in the network---eliminating sources of curtailment in the network that can be quickly and relatively inexpensively remedied.

Tilt Renewables does not consider that further work on the hybrid model will result in a practical solution that could demonstrate definite and significant benefits to the market or consumers.

Thank you for the opportunity to comment on the Consultation Paper. Please feel free to contact jonathan.upson@tiltrenewables.com should you have any questions or wish to discuss our submission.

Yours Sincerely,

Jonathan Upson
Head of Policy & Regulatory Affairs
Tilt Renewables

Industry stakeholder feedback guide – Transmission Access reform

RE - AEMC Consultation Paper - Transmission Access reform – April 2024 EPR0098

The AEMC has published a Stakeholder Feedback Template alongside the consultation paper for the Transmission Access Reform project.

The AEMC's list of consultation questions laid out in the template represent a good start. However, it is critical that detailed industry perspectives are drawn out, particularly as these relate to the material issues identified over the last few years of stakeholder consultation.

This document draws out those detailed issues and is intended to complement the AEMC's feedback template. Questions have been prepared by a group of industry participants who have had extensive experience in the development of the TAR process. They are intended to add to the depth and quality of stakeholder feedback to the AEMC's processes.

Stakeholders are invited to amend or add to this document as they see fit – it is intended as a guide only and is not an exhaustive description of all the issues. Stakeholders are also welcome to use this template as the basis of their submission, recognising that AEMC questions and industry questions have been purposefully separated.

Submissions are to be lodged via the AEMC's website by **6 June 2024**.

SUBMITTER DETAILS

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DATE: 6 June 2024

Testing and modelling the hybrid model

Feedback on cost benefit analysis (CBA) conducted in 2023

AEMC Question 1: Feedback on cost benefit analysis (CBA) conducted in 2023

What are stakeholder views on the assumptions used in the CBA?

Market participants were not properly consulted on the inputs or assumptions of the CBA contributing to the CBA being invalid.

Industry's additional questions for consideration:

(a) Do you consider NERA's CBA modelling of COGATI in 2020 and CMM/CRM updated analysis in 2023 to be an accurate Cost Benefit Analysis of the current (Priority Access and Congestion Relief Market) hybrid model? Why / why not?

The CBAs described above are not valid as they had inappropriate inputs/assumptions and were conducted on an Access Model that bears little semblance to the hybrid model (let alone the variants currently being put forward in this Paper).

(b) Do you consider the Cost Benefit Analysis appropriately reflects the impact on financial markets? If not, do you consider that financial market impacts would likely have a material impact on a CBA?

No, we do not consider that the impacts on Financial and Offtake Markets has been adequately considered as evidenced by the continuing concern of the Australian Financial Markets Association. There is little doubt that the hybrid model, particularly the Congestion Relief Market (CRM), will have significant impacts on financial markets.

(c) Do you support a new Cost Benefit Analysis being undertaken of the model ultimately recommended by the AEMC even if it causes a delay in the decision process? Why do you consider this necessary or unnecessary?

Yes, once the AEMC arrives at a preferred model, they should work collaboratively with industry on inputs, assumptions and scenarios and a new CBA undertaken. While this will take time, the hybrid model is effectively a re-design of the NEM and Ministers should want to confirm the 'cure' is not worse than the 'disease'. The AEMC's reluctance to undertake this work is concerning as such a position appears to demonstrate a lack of confidence that their preferred model would demonstrate a cost benefit.

The hybrid model will disrupt the only market for an essential service. Undertaking such massive changes without an up-to-date CBA of the currently proposed changes cannot be supported.

Feedback on prototyping

AEMC Question 2: Feedback on prototyping

What are stakeholder views on the result of the prototyping analysis? Is there any additional analysis that would be useful?

The results of the prototyping analysis as documented in question (2a) below should be concerning to all stakeholders including Energy Ministers.

Industry's additional questions for consideration:

(a) As stated in the Paper (p. 25), last year's prototyping analysis of Priority Access (PA) model showed that wholesale prices were higher in 31% of the cases and a highest priority access generator was curtailed more in 30% of the cases analysed compared to the status quo.

Do you think the materiality and implication of these identified issues has been adequately addressed in the Paper? If not, what additional analysis do you consider is required?

No, the serious issues uncovered by the modelling last year have not been sufficiently addressed. Some new ideas have been proposed, but the AEMC admits there has not been nearly enough modelling undertaken. In addition, these new ideas cause additional new problems as described below.

How significant do you consider the issues to be?

Proceeding with the hybrid model without fixing these two issues, as well as others mentioned below, appears untenable. How can one justify disrupting the market for an essential service with new rules and markets that increases prices and doesn't work as intended 1/3 of the time?

(b) Do you consider sufficient analysis has been undertaken to explore how the CRM and Priority Access models will work in combination?

No; not nearly enough modelling and stress testing has occurred including the potential for gaming the interaction between the two markets.

Feedback on modelling the hybrid model

AEMC Question 3: Feedback on modelling the hybrid model

Noting that this work is still being completed, do stakeholders have any initial views on how modelling priority access would impact investment decisions?

T*he fundamental premise of Priority Access is that new developments, after PA is in effect, must be able to accurately forecast their level of curtailment at time of investment, and into the future. The result of a 'hard' PA is easier to forecast, but the answer will make it very difficult for projects to still achieve FID. All incremental curtailment to the existing 500+ generators will be borne 100% by one's 'new' project. While a 'soft' PA will not be as harsh, accurately forecasting curtailment will be much more difficult.*

Industry's additional questions for consideration:

(a) After the hybrid model starts (i.e. in 2028), what effect will Priority Access have on new development projects achieving FID? Will they find it easier or harder, and why?

As the first new development project will wear most (soft PA) or all (hard PA) the incremental curtailment for the 500+ grandfathered generators, the revenue

decline, and uncertainty, will be very significant for new generators. In addition, the preferred model results in the new generation wearing most, or all, of the curtailment caused by scheduled, and unscheduled, network outages. Last, the new generators will suffer the incremental curtailment caused by any new constraint equations after FID which are, obviously, very difficult to forecast.

For the CRM, the operation of the CRM is not well understood. The modelling undertaken so far has been rudimentary and does not take into account varied bidding strategies.

Taken together, there is very little doubt that new investment decisions will be significantly more difficult after the hybrid model starts---even in areas of low curtailment.

(b) Do you consider that the risks with implementing the hybrid model have been adequately considered and addressed? What are the key risks and how serious are they? What would be the advantages and disadvantages of not implementing the hybrid model?

The limited modelling and flawed CBA undertaken to date has resulted in the key risks not being adequately explored or quantified. The potential for new investment to fall off a cliff after the hybrid model starts has not been evaluated. The risks that market participants will figure ways to 'game' the CRM, and its relationship to the energy market run, have not been examined. Considering that electricity is an essential service, it is surprising that a decision to significantly disrupt this market could be taken without an honest risk assessment.

The advantage of deciding to implement the hybrid model is that all existing generation will have top priority access for at least 10 years. There are many disadvantages and risks as discussed elsewhere.

(c) What do you consider the impact of the hybrid model will be on emissions? Is a technology-neutral approach granting highest priority access to thermal (and renewable) incumbent generators appropriate? Has the role of emission reductions objective in the NEO been considered appropriately?

In the May 2023 consultation paper, it is argued that incumbent thermal generators will not benefit from highest priority level access as very few are behind constraints.

> *"Many fossil fuel generators are currently in uncongested parts of the grid. In general, the treatment of legacy generators in the priority access model is not a choice between old high emission generators and new low emission generators, but between older and newer low emission generators." (p. 43)*

In this Paper, the AEMC appears to be making the case for the ***opposite position*** *--- that thermal generators will be the most likely participants in the CRM behind one of more constraints. Regarding the CRM,*

> *"Prospective buyers would generally be high cost and high emission generators behind a constraint that are dispatched under the status quo, and who are willing to reduce their output..."*

It would be helpful for the AEMC to provide data demonstrating whether thermal generation will not be a beneficiary of Priority Access as they are rarely constrained or a primary seller of congestion relief because they are often constrained.

Besides this inconsistency, this issue highlights a potential key risk that thermal generators with no intention to generate (because it's not economic to do so) will figure out a way to be 'dispatched' in the energy run and then sell not being dispatched in the CRM run thereby being paid to not generate as they intended all along. Relying on 'good faith' bidding obligations is insufficient to preclude such behaviour. Besides gaming the system, such an outcome does not result in a reduction in emissions, as claimed in the Paper, as the generator had no intention to generate in the first place.

If material amounts of thermal generation are prioritized for access over zero marginal costs renewable generation by the preferred hybrid model, it is self-evident that such a result contradicts the NEO and the Government's policies to reduce carbon emissions---particularly in the electricity sector.

(d) What matters need to be considered for modelling the effects of the hybrid model on investment in long lead time assets, such as pumped hydro or other forms of storage?

As pumped hydro involves larger and longer-term capex investment, it would be very difficult for such projects to achieve FID after the hybrid model is in effect with lower priority access.

(e) In regard to protecting REZ access rights, do you consider that alternatives to the hybrid model, such as the various 'controlled access' models flagged by NSW and QLD, might form a viable alternative to the hybrid model?

Tilt considers that the proposed Queensland and Victoria REZ policies to restrict access to the shared network for projects that will cause material detriment to REZ generators, who are paying large amounts of money to connect to new infrastructure, is a viable alternative to the hybrid model that should be considered. VicGrid's recent REZ access paper demonstrates 'controlled access' models are under very active consideration.

Assessment of key model options

Assessment of priority access allocation models

AEMC Question 4: Assessment of priority access allocation models

Each model option outlined in this section addresses the problem and reform objectives to different degrees.

Which model option do you prefer and why?

Tilt considers that Options 1 and 2 will end up being effectively the same as every State will make sure their REZs achieve whatever milestone is necessary to achieve the highest priority access. As an example, Victoria is not going to allow the NSW SW REZ to have higher priority access than its Northern REZs.

Option 3 eliminates one of the fundamental stated benefits of PA, namely that generators coming after your project will not 'cannibalise' your access. In Option 3, the 2nd 'new' generator connecting after the hybrid model is operational will have the same priority as the 1st 'new' generator. Therefore, the 1st new generator has lower access than the 500+ grandfathered access and no better access than every generator connecting later--- a lose-lose proposition.
As the Paper states, Option 4, Dynamic Grouping, "has not been tested yet, or developed in any detail" and therefore cannot be seriously considered without a lot more modelling and analysis of risks and benefits. In a recent Technical Working Group meeting, AEMO made the very sensible point that if one desires two tiers, then Option 3 is a much, much simpler and less risky way to accomplish it. In addition, Option 3 provides certainty as to which Tier a generator will be in whereas Dynamic Grouping does not reduce investor certainty. However, as noted above, Tilt Renewables does not consider a two-tier approach as worthy of further consideration.

The short answer to the above question is the AEMC's preferred PA model is the least bad alternative; however, none of them are supported.

Industry's additional questions for consideration:

(a) For the model selected in your response to AEMC's Q4, do you consider this model will benefit your business or organisation? Do you think it will benefit the electricity market as a whole? Please explain your rationale.

Tilt Renewables does not support the implementation of Priority Access. While PA will benefit all existing generators (even if they are high emission generators), Tilt considers that achieving FID once PA is in effect will be extremely difficult and is very likely to cause new investment to fall off a cliff.

(b) What effect would grandfathering the highest priority access for existing generators have on coal retirement decisions?

There is no doubt that grandfathering of existing coal generation for the highest level of access will not cause them to retire earlier. Should PA be implemented, there must be provisions to eliminate the possibility of coal fired generation constraining off zero marginal cost clean energy generation because they were built decades ago. Such an outcome directly contradicts the NEO by curtailing low priced, low emission electricity generation.

Assessment of CRM implementation approaches

AEMC Question 5: Assessment of CRM implementation approaches

What are the relative advantages and disadvantages of each design?

Do stakeholders have a preferred design and if so, why?

As the Paper states, the Co-Optimised model "has not been developed to the level of detail as the two-stage dispatch". In addition, AEMO has raised significant concerns whether this design is practical, or even workable. Therefore, the Co-Optimised model cannot be seriously considered without a lot more modelling and analysis of feasibility, risks and benefits.

In addition, the Co-Optimised model effectively eliminates the fundamental 'opt-out' feature of the two stage CRM. While a generator can opt out of the Co-Optimised CRM, the RRP in the Co-optimised model has been re-defined by merging it with the CRMP. Therefore, generators who opt out of CRM will still be impacted by CRM as the RRP is no longer the same. This will also cause every offtake contract in effect at the time the hybrid model takes effect to be re-negotiated as the RRP, and its value, has changes since the PPA was executed.

The short answer to the question above is the AEMC's preferred two-stage CRM model is the least bad of the two alternatives; however, neither are supported.

Industry's additional questions for consideration:

(a) For the preferred model design selected in your response to AEMC's Q5, do you consider this model will benefit your business or organisation? Do you think it will benefit the electricity market as a whole? Please explain your rationale.

Tilt Renewables does not support implementation of the two stage CRM proposal for many reasons, including:

- *There is very little understanding of how the CRM would actually function in the real world thereby increasing investment uncertainty*
- *It's very likely there will be serious unintended consequences such as market participants figuring ways to game the CRM in conjunction with the energy dispatch run*
- *Detrimental impact on current, and future, PPAs as discussed below*

(b) On page 64 of the Paper, it is stated:

"there could be a perception co-optimisation is less voluntary than the current lead model as CRM bids could affect or set the RRP that all participants face, including participants who do not opt into the CRM."

Do you consider the co-optimised CRM remains a voluntary model?

As stated above, the co-optimised CRM changes the definition of the RRP which makes it impossible for generators opting out of the CRM to avoid being materially impacted. Therefore, even generators who opt out will be involuntarily impacted by the CRM.

Do you have an adequate understanding of the operation and implications of the co-optimised CRM? If not, what further work is required?

It is clear that there is very little understanding of the Co-Optimised model. If it was deemed to be worthwhile, much more modelling and assessment of risks and benefits would be required taking any decision well into next year.

Key stakeholder concerns

Feedback on impact of the hybrid model on PPAs

AEMC Question 6: Feedback on impact of the hybrid model on PPAs?

What are stakeholder views on the observations and AEMC initial views regarding impacts of the hybrid model on PPAs?

See below.

Industry's additional questions for consideration:

(a) Does your organisation have PPAs that will still be in force in 2028? If so, how likely is it they will have to be renegotiated considering clauses covering obligations to maximise generation, change of law and/or market disruption? Do you expect these renegotiations to be easy?

Tilt Renewables will have a number of PPAs still in force by 2028, and for some time thereafter. These PPAs will almost certainly be open to re-negotiation when CRM is implemented for several reasons. First, as the question states, obligations to maximise generation are standard in every offtake agreement. Therefore, it stands to reason the offtake party could reasonably force the generator to participate in the CRM as every successful CRM bid to 'buy' congestion relief increases generation. Second, opting into the CRM will almost certainly benefit ***either*** *the generator or the offtaker. Therefore, once operation of the CRM is thought to be understood, the party considering it will gain a financial advantage by opting into the CRM will want the generator to participate in the CRM while the other party would oppose participation. This is a recipe for re-negotiation. This re-negotiation will be problematic as each party will understandably argue for their own financial interest.*
Third, as the question notes, PPAs contain clauses around Market Disruption and Change of Law that, depending on their wording, could be argued to take effect once the CRM comes into operation.

Should the generator opt into the CRM, renegotiation is inevitable as part of the generation will settle at the CRMP which is obviously an undefined term in current PPAs and will almost always be different than the RRP.

The only circumstance where re-negotiation of a current PPA can be avoided is when both parties agree that the generator never participates in the two stage CRM. While this could occur, it would be to the detriment of the party that would gain financial advantage by participation in the CRM.

(b) Should Energy Ministers make a final decision to implement the hybrid model this year, will this make negotiation of new PPAs next year easier, more difficult, or pretty much the same? Why would this be, and would the change be significant?

There is no doubt that a decision by Energy Ministers to proceed with the hybrid model would complicate future PPA negotiations. The CRM introduces a new, unpredictable and difficult to accurately forecast market that would have to be

addressed in every PPA. This was seen a few years ago when COGATI was under discussion; PPA negotiations were stalled due to an inability to handle such a significant, and unpredictable, change in the market.

The only potential exception to this, as previously mentioned, would be instances where both parties agreed never to participate in the CRM. However, this would appear unlikely as there is very little understanding of how the CRM would operate and how much financial advantage could be gained by one party.

Feedback on impacts of the hybrid model on financial markets

AEMC Question 7: **Feedback on impacts of the hybrid model on financial markets**

What are stakeholder views on the impacts of the hybrid model on financial markets? Specifically:

a) How the proposed access model, or particular aspect(s) of the model, may impact

b) their ability to manage price risk in the market?

c) The subsequent impact that a reduced ability to manage price risk may then have on participants' hedging costs.

Industry's additional question for consideration:

Besides the impacts listed in AEMC's Question 7, what other impacts could the hybrid model have on financial markets?

There are a variety of potential impacts as outlined in the submissions by the Australian Financial Markets Association.

Feedback on wide-reaching constraints

AEMC Question 8: Feedback on wide-reaching constraints

Do stakeholders consider that priority access could increase investment risk due to wide-reaching constraints?

New constraints, after an intending generator reaches FID, are a significant investment risk in PA---whether they are 'wide-reaching', or not. While this risk exists today, the curtailment caused by new constraints is shared by different generators (on the basis of their congestion coefficients). However, under Priority Access, the curtailment caused by new constraints will be borne primarily, and more often entirely, by the new generator(s).

Do stakeholders consider that there is value in implementing the dynamic grouping option for priority access to mitigate this concern?

While Tilt Renewables appreciates the AEMC taking a preliminary look at a mechanism to mitigate this concern, we consider the multiple disadvantages of Dynamic Grouping to be very significant, as previously discussed.

Industry's additional questions for consideration:

(a) Comment - Even for new generators locating in areas of low curtailment, new developments would suffer much more curtailment for scheduled, and unscheduled, network outages compared to generators with the highest level access.

During network outages, should new developments experience much more of the resultant curtailment than grandfathered highest priority access generators?

Tilt Renewables considers that new developments should not suffer far greater curtailment for network outages compared to grandfathered high priority access generators.

How difficult would it be for new generation to manage this risk?

The risk of having most, or likely all, of one's generation curtailed during every network outage due to Priority Access cannot be effectively managed. The curtailment due to scheduled network outages could possibly be forecast to some level of accuracy; however, unscheduled outages lasting days, weeks or even longer are obviously more difficult to accurately forecast.

(b) Even for new generators locating in areas of low curtailment, there is a risk that new constraint equations could emerge later, sometimes coincident with grid augmentations like PEC, for which they will suffer much more curtailment than generators with the highest level access.

For new constraint equations, should new developments experience much more of the resultant curtailment than grandfathered highest priority access generators?

Priority Access is meant to discourage new generation investment in congested areas of the network. If a company makes such an investment in good faith and then, a year or two later, faces a new, significant constraint, for which they suffer 100% curtailment due to Priority Access, this is clearly not equitable as they could not have foreseen the new constraint. Again, this risk exists today, but is shared by other generators affected by the new constraint, thereby mitigating the risk. This mitigation would not happen with Priority Access.

How difficult would it be for new generation to manage this risk?

The risk cannot be managed; however, debt and equity will have to take a view on the likely loss of generation and revenue. Financial institutions, in particular, tend to take a very conservative, 'worst case', view of such risks creating another obstacle to new developments proceeding under Priority Access.

(c) Section 3.3 of the Paper describes further analysis to be undertaken by ACIL Allen.

What scenarios and impacts would you like to see this analysis evaluate to provide more clarity and confidence that investors will have more certainty and less risk after the scheme begins (in 2028)?

For Priority Access:

- *How accurately can new generators forecast their curtailment under the AEMC's preferred Priority Access model, considering:*
  - *The 'soft' nature of the preferred model*
  - *Operation of the model resulting in perverse outcomes as already seen in previous modelling*
  - *Network outages, scheduled and unscheduled*
  - *New constraint equations*

For the CRM

- *Inputs*
  - *Low, Medium and High Opt-in participation (10%, 50% and 90%)*
  - *Different bidding scenarios and strategies*
    - *Including the potential for 'opportunistic' gaming of the CRM by generators not intending to generate and loads not intending to load shed selling their 'congestion relief' into the CRM.*

(d) The Paper notes that the dynamic grouping option "*has not been tested yet, or developed in any detail*" (p. vi).

Do you think an informed decision on this option is feasible this year? Do you support further consideration of this option?

There is little chance of an informed decision on Dynamic Grouping being possible this year. There is too much modelling work as well as analysis of results, benefits and risks to be undertaken this year.

Tilt Renewables does not consider further work to be worthwhile. If the AEMC wants to undertake additional work, they should receive approval by Energy Ministers to delay any decisions until well into next year.

Detailed design questions

Feedback on detailed priority access design choices

AEMC Question 9: Feedback on detailed priority access design choices

What are stakeholder views on the detailed priority access design questions and the AEMC's preferred positions?

Without prejudice to our overall position, our 'preferred' design choices are:

- *Soft priority*
- *Fixed duration*
- *High priority for same duration of new entrants*
  - *However, thermal generation is not grandfathered such that it has higher priority than zero marginal cost, zero emission generation*
- *Milestone based approaches*

Industry's additional question for consideration:

Does your organisation support implementation of Priority Access?

No

AEMC Question 10: Feedback on detailed CRM design choices

Do stakeholders have further views on the detailed design choices for the CRM that were explored by the ESB? Are these views related to a preference for a two-step or co-optimised implementation approach discussed in Chapter 5?

What are stakeholder views on tethering, including the relative advantages and disadvantages of each design and any preference?

Tilt does not have a definitive preference in regard to these design choices.

Industry's additional questions for consideration:

(a) The Paper notes the co-optimised implementation approach "*has not been developed to the level of detail as the two-stage dispatch*" (p.vii).

Do you consider an informed decision on this option is feasible this year? Do you support further consideration of this option?

There is very little chance of an informed decision on Co-Optimisation being possible this year. There is too much modelling work as well as analysis of feasibility, results, benefits and risks to be undertaken this year.

Tilt Renewables does not consider further work to be worthwhile. If the AEMC wants to undertake additional work, they should receive approval by Energy Ministers to delay any decisions until well into next year.

(b) Does your organisation support implementation of the Congestion Relief Market?

No

(c) If Energy Ministers made a final decision to implement the hybrid model, do you consider that investors and developers would have increased or decreased investment certainty, and why?

There would be some short to medium term benefit to investment certainty from Priority Access----until the scheme came into effect. Once the scheme started, there would be far greater uncertainty, risk and financial impediments to new projects achieving FID. A draught of new investment would be very likely.

There will be greater uncertainty due to the CRM in the short and medium term as how the CRM would actually operate in the real world is not clear. Unless the project signs an offtake agreement agreeing to opt out of the CRM, there would also be increased uncertainty and more difficult PPA negotiations as discussed earlier.
Other comments
Information on additional issues