

Jessie Foran
Project Lead, Transmission Access Reform
Australian Energy Market Commission
Sydney NSW 2000

European Energy A/S
Gyngemose Parkvej 50
2860 Søborg
+45 8870 8216
info@europeanenergy.dk
www.europeanenergy.com

By online submission

15 June 2024

Submission: Transmission Access Reform Consultation

Dear AEMC,

European Energy is global renewable energy operator with a presence in 28 countries and a strong track record of successfully building utility scale wind and solar projects, with more than 280 large-scale projects in operations around the world.

We develop, finance, construct and operate wind and solar farms as well as large-scale PtX plants and storage projects. Founded in 2004, European Energy has a development pipeline of more than 60 GW of renewable energy projects and is currently constructing more than 1 GW of new energy capacity.

Please see our [Company Presentation](#) for more information on our current activities. European Energy's [financial reports](#) are available for download.

We entered the Australian Market in 2022, and currently have 56MW under construction and >5GW under development. Our business model of developing, constructing and operating renewable energy assets allow us to offer compelling proposals to energy users. A recent example of this was the award of a Power Purchase Agreement to the 1100MW Upper Calliope Solar Farm to supply the Gladstone Aluminium operations of Rio Tinto.

The open access transmission arrangements of the Australian National Electricity Market (NEM) were key to European Energy's decision to enter this market.

The proposed introduction of priority access undermines the open access arrangements of the NEM, favouring incumbent suppliers over potential new entrants, so reducing competition and driving up price. It is noted that a cost benefit analysis was presented suggesting that the proposed new arrangements would result in a lower overall cost due to reduced stranding of new assets. A key assumptions underpinning this analysis is fundamentally flawed, in that it assumes investors do not and will not respond to the strong location signals of the current market design.

European Energy believes that open markets with a level playing field are critical to maximising competition and driving decarbonisation at lowest cost. The proposed priority access arrangements undermine this level playing field and reduce competition, and hence should not be given further consideration.

Kind regards,

Catriona McLeod
Country Manager, Australia
European Energy