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Dear Zak,

Thank you for the opportunity to contribute feedback on the Consultation Paper for the Australian Energy Market Commission (AEMC) review on electricity pricing for a consumer-driven future.

Elgin is an innovative and fully integrated platform specializing in utility-scale solar and energy storage solutions, committed to advancing the renewable energy transition.

Since our establishment in Ireland in 2009, we have developed a robust pipeline exceeding 15 GW, encompassing solar, co-located, and storage projects across the UK, Ireland, Germany, Italy, and Australia.

We strongly support the focus on placing consumers at the heart of this review. Additionally, we encourage the review to address regulatory barriers that currently limit the effective utilization of energy storage on distribution networks. While residential consumers may not directly engage with utility-scale batteries on distribution networks, they stand to benefit significantly from reforms aimed at fostering greater adoption of such technologies.

We also urge the review to establish a fair and equitable tariff structure for utility-scale batteries. There is strong interest in pursuing projects on sub-transmission and high-voltage distribution networks. However, the current Network Use of System (NUoS) tariff regime undermines the viability of these projects (unlike on transmission connected projects) creating a disparity between transmission-connected batteries and those connected at the distribution level.

We look forward to collaborating with you as this review moves forward.

Best regards,
Paul Maguire
Head of Finance
Elgin Energy PTY Ltd