

Ms Merryn York
Acting Chair
Australian Energy Market Commission
Lodged online: www.aemc.gov.au

19 October 2020

Dear Ms York,

Co-ordination of generation and transmission investment implementation

On behalf of RATCH-Australia Corporation, I would like to submit the following brief response to the AEMC's interim report on its proposal for transmission access reform, which I hope you are able to consider.

Background

RATCH-Australia Corporation is an independent power producer with a portfolio of generation assets in Australia with a capacity of more than 1.2GW.

This portfolio includes:

- 180.5MW Mount Emerald Wind Farm in Far North Queensland, commissioned in 2018
- 226.8MW Collector Wind Farm currently under construction in NSW
- 42.5MW Collinsville Solar Farm, commissioned in 2019
- 214.2MW Yandin Wind Farm (RATCH-Australia acquired a 70% interest in 2019). Construction, managed by Alinta Energy, due to complete in 2020
- 33MW Starfish Hill Wind Farm
- 21MW Toora Wind Farm
- 12MW Windy Hill Wind Farm
- 119MW Kwinana Power Station
- 310MW Kemerton Power Station
- 242MW Townsville Power Station

RATCH-Australia has been developing, building and operating renewable energy projects since 2011.

The company is a wholly-owned subsidiary of the RATCH Group, which is listed on the Stock Exchange of Thailand and has a market capitalisation equivalent to approximately \$4bn.

Response

RATCH-Australia endorses the content of the submission provided by the Clean Energy Council, of which the company is a sponsoring member, which we note was developed following extensive engagement with, and input from, industry participants.

In particular, as an active investor in new generation capacity, RATCH-Australia most strongly supports the assertion that *"it is simply the wrong time to implement a reform such as the transmission access proposal as it will increase the cost of new projects and potentially stifle new investment."*

While we are in general terms supportive of solutions leading to smoother access to transmission infrastructure for new generation, RATCH-Australia considers that this proposal will introduce significant additional complexity and risk for generation projects in development, and this has the potential to cause an investment freeze.

The proposal also has the potential to significantly negatively impact the financial outcomes for projects that have recently begun operating. This would disadvantage investors who have recently committed to Australian generation projects. In this context it represents a form of sovereign risk and will further discourage investment in Australia.

Given this clear potential for new and recent entrants to be significantly disadvantaged by these proposals, any transitional arrangements need to be very carefully considered.

RATCH-Australia would be pleased to discuss our concerns in more detail. If you have any questions about this submission, please contact Ian Lawrence at ian.lawrence@ratchaustralia.com.au in the first instance.

Yours sincerely,



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