

Mr Peter Adams
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Australian Energy Regulator
By email: wholesaleperformance@aer.gov.au

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Response to AER Semi-Scheduled Generator Rule Change Issues Paper

On behalf of RATCH-Australia Corporation, I would like to submit the following brief response to the AER issues paper discussing possible rule changes for semi-scheduled generators, 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, is due to complete in 2020

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 Dr Harley MacKenzie of HARD Software and Stephen Wallace of SW Advisory.

In particular, we are concerned that the measures discussed would severely restrict the operation of semi-scheduled generators. We note that semi-scheduled generators in Australia are primarily large scale onshore wind and solar generation. We are concerned that the measures discussed are likely to decrease the efficiency and increase the cost of energy for these projects.

Finally, we are concerned about the proposal to fast-track rule changes for any of the solutions outlined. We consider that these changes will have material economic impacts on both existing and development projects. It is pertinent that any proposed changes are carefully analysed and undergo adequate consultation, allowing generators and developers to understand and plan for any changes.

Yours sincerely,



Anthony Yeates
Executive General Manager Business Development