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Mark Feather  
General Manager, Strategic Policy & Energy Systems Innovation  
Australian Energy Regulator  
GPO Box 3131  
CANBERRA ACT 2601  
Lodged by email to: [AERringfencing@aer.gov.au](mailto:AERringfencing@aer.gov.au)

Dear Mark,

***Response to: Consultation Paper – Options to address gaps in transmission ring-fencing framework***

Tilt Renewables welcomes the opportunity to comment on the Australian Energy Regulator's ring-fencing Consultation Paper (the Paper).

Tilt Renewables is committed to continue playing a lead role in accelerating Australia's transition to clean energy. Tilt is the largest owner and operator of wind and solar generation in Australia with 1.3 GW of renewable generation capacity across nine wind and solar farms and another 396MW wind farm (Rye Park in NSW) currently under construction. In addition, Tilt Renewables has a development pipeline of over 5GW including the 1.5GW Liverpool Wind Farm development project in NSW's CWO REZ as well as several energy storage projects.

**Tilt Renewables supports both Options 1 and 2 as discussed in the Paper.**

Option 1 provides additional transparency for market participants and increased accountability for TNSPs at little additional cost to TNSPs. Providing documentation demonstrating compliance with the Chapter 5 clauses in Section 1.1.1 would be beneficial--- particularly clause 5.3.6 (b4) requiring the provision of unbundled pricing. Besides providing information on actual connection enquiry response timeframes, we consider that reporting of actual timeframes for other aspects of the connection process would also be beneficial. Mandatory reporting of the relevant connection information listed on page 31 would be useful in tracking TNSP performance and enabling some comparisons to other TNSPs. The amount of work involved for the TNSPs would not be material and may be already tracked by some TNSPs. With regards to connection timeframes and costs, we would suggest that the connection voltages be reported to provide context to the information. For example, 3 x



132kV connections and 2 x 220kV connections cost \$\_\_\_\_. This would avoid misleading comparisons between one TNSP's 3 x 132kV connections and another TNSP's 3 x 500kV if connection voltages are not specified. This is because higher voltage connections are much more expensive.

As pointed out in Section 3.2.3, Tilt Renewables supported a rule change to expanding the ring fencing framework to include negotiated transmission services in response to Version 4 of the Ring Fencing Guidelines. Tilt Renewables continues to support such a rule change, and therefore, supports Option 2 in the Paper. We agree that the benefits stated at the beginning of Section 5.3.2 would be achieved, at least to some extent, which would benefit Connecting Generators---as well as electricity consumers. Reducing delays in the connection process accelerates the availability of zero marginal cost generation entering the market lowering wholesale electricity prices. Likewise, reduced connection costs enable lower offtake prices to be offered to industrial customers.

Tilt Renewables considers that Option 2 would have greater benefits to Option 1; however, as Option 1 does not entail much extra work on behalf of the TNSPs, it should also be implemented.

Thank you for the opportunity to provide a submission on the Consultation Paper. If you would like to discuss any of the issues raised in this submission further, please contact the undersigned at [REDACTED].

Yours sincerely,

A solid black rectangular box redacting the signature of Jonathan Upson.

Jonathan Upson  
Head of Policy & Regulatory Affairs