



1 February 2022

Energy Security Board

RESPONSE TO PROJECT INITIATION PAPER ON CONGESTION MANAGEMENT MODEL

Alinta Energy appreciates the opportunity to provide feedback on the ESB's *Transmission Access Reform Project Initiation Paper*.

Alinta Energy notes that the key objective of this workstream is to optimise renewable energy investment and achieve the NEM's energy transition at least cost by avoiding new renewable generators inefficiently displacing existing renewable energy.

While Alinta Energy strongly supports this objective and welcomes the ESB's more pragmatic approach to achieving it, it considers that, in the short to medium term, the various State-based REZ schemes, and their ambitions to accelerate investment in renewable energy, will be the primary factors determining where renewable generators locate in the network.

Given this, Alinta Energy recommends that the ESB progress its plans to coordinate and harmonise the various REZ schemes as the first priority, prior to undertaking any further work on considering a CMM.

While Alinta Energy perceives the potential benefits of the ESB's proposed CMM over the longer term, it is concerned that implementing a broad and consequential congestion management model before the State-based renewable energy schemes are properly integrated and understood may further complicate investment decisions, and unnecessarily increase risk for incumbents.

To avoid this, Alinta Energy suggests that the ESB focus the scope of the CMM to resolving any congestion issues that remain after it completes its important work to efficiently integrate the State-based renewable energy schemes into the NEM.

Thank you for your consideration of Alinta Energy's submission, should you wish to discuss this further, please contact me at oscar.carlberg@alintaenergy.com.au, or on 0409501570.

Yours sincerely

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