



19 March 2018

By email [isp@aemo.com.au](mailto:isp@aemo.com.au)

Audrey Zibelman  
CEO, Australian Energy Market Operator

## Integrated System Plan Consultation – Stakeholder Feedback

Dear Audrey,

I am taking the opportunity to share some brief comments on the ISP as per your consultation document. Smaller renewables generation businesses like Adani Renewables struggle to find the bandwidth to interact with these important consultation initiatives, however we see participation as critical. I hope that these comments although brief will still contribute something to this important debate.

Specifically, I was concerned that in the scenarios to be analysed, the goal of providing energy to our industry and the wider community at a globally competitive energy price, to provide our economy with a level of competitive advantage from our resources, does not appear to register as a possible target for scenario planning and modelling. Of course this would first require some analysis as to what does constitute a globally competitive energy price now and into the short and medium term future, recognising that the world is changing and that the cost of energy in terms of purchasing power may well be higher than it has been in the past. I think that, to address the expectations of the Australian community, we need to understand what a path to a globally competitive energy price might look like, how quickly we might get there and what barriers might need to be addressed if the goal were to be achieved (for example gas exploration, infrastructure costs, approval costs). There would then be an opportunity to consider the feasibility of the pathway identified.

To expand on the above point, in the scenarios considered, all the target trajectories seem to be focussed primarily around emissions reduction. Considering only these options does not make sense to me in a context where we understand that there will be an increasing percentage of renewables in the energy mix due to costs reducing over time, and where we know that climate change is a global problem where the extent of Australia's contribution to carbon dioxide emissions reduction will in and of itself not determine the outcome. I believe that we should consider a scenario where we focus on competitive energy price to help our economy and community remains strong and resilient, so we are prepared to mitigate any climate-induced risks, as we transition to an energy mix that generates lower carbon dioxide

**Adani Renewable Asset Holdings Pty Ltd**  
Level 25  
10 Eagle Street, Brisbane QLD 4000  
GPO Box 2569, Brisbane QLD 4001  
Australia

Tel +61 7 3223 4800  
Fax +61 7 3223 4850  
[reception.australia@adani.com.au](mailto:reception.australia@adani.com.au)  
[www.adanirenewables.com.au](http://www.adanirenewables.com.au)

**Registered Office:** Level 25, 10 Eagle Street, Brisbane QLD 4000, Australia  
**ABN:** 96 620 876 100



emissions. As a minimum we should understand what a system transition plan to achieve a target of a globally competitive energy price would look like.

I have heard many commentators including Ross Garnaut express a view that our renewables resources will take us to the point where energy is generated at a globally competitive price in the fullness of time. I consider that there may be trajectories involving a mix of energy sources that get us there more quickly whilst at the same time reducing emissions. Solving specifically for a cost outcome, and considering this result, will give a different outcome to solving for an emissions end point and then considering cost.

Once again, I hope these brief comments add something to the ongoing debate.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Jenny Purdie".

Jenny Purdie

**CEO | Adani Australia Renewables**