



Meridian Energy Australia Pty Ltd

20 September 2019

Australian Energy Market Operator  
Email: LBSP.consultation@aemo.com.au

Dear AEMO

### **Amendments to Guidelines for Preparing Local Black System Procedures**

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (MEA Group or Powershop) thanks the Australian Energy Market Operator (AEMO) for the opportunity to provide comments on the Amendments to Guidelines for Preparing Local Black System Procedures Consultation Notice (the Notice).

#### Background on the MEA Group

MEA Group is a vertically integrated generator and retailer focused entirely on renewable generation. We opened our portfolio of generation assets with the Mt Millar Wind Farm in South Australia, followed by the Mt Mercer Wind Farm in Victoria. In early 2018 we acquired the Hume, Burrinjuck and Keepit hydroelectric power stations, further expanding our modes of generation. We have supplemented our asset portfolio by entering into a number of power purchase agreements with other renewable generators, and through this investment in new generation we have continued to support Australia's transition to renewable energy.

Powershop is an innovative retailer committed to providing lower prices for customers and which recognises the benefits to customers in transitioning to a more distributed and renewable-based energy system. Over the last five years, Powershop has introduced a number of significant, innovative and customer-centric initiatives into the Victorian market, including the first mobile app that allows customers to monitor their usage, a peer-to-peer solar trading trial and a successful customer-led demand response program. Powershop has also been active in supporting community energy initiatives, including providing operational and market services for the community-owned Hepburn Wind Farm, supporting the Warburton hydro project, and funding a large range of community and social enterprise energy projects through our Your Community Energy program.

MEA Group supports AEMO's review of the Guidelines for Preparing Local Black System Procedures (LBSP). However we are concerned that the proposed amendments focus on larger capacity generators, implying that a 'one size fits all' approach would be considered appropriate and sufficient for preparing the LBSP.

MEA Group would like to engage and consult with AEMO to discuss preferred LBSP guideline amendments that could be implemented to ensure that our small-scale generator preparations for LBSP is efficient and effective, as distinct from implementing amendments that do not relate to our business or incur unnecessary costs and resources.

If you have any queries or would like to discuss any aspect of this submission please do not hesitate to contact me.

Yours sincerely,



Powershop Australia Pty Ltd  
Meridian Energy Australia