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REACH SOLAR ENERGY – TRANCHE TWO ISSUES PAPER SUBMISSION

Reach Solar energy (**Reach**) is pleased to provide its response to the NSW Government titled “Tranche two regulations to support the electricity Infrastructure Roadmap” (**Regulations**).

By way of background, Reach is a developer of large-scale solar photovoltaic and distribution connected energy storage projects. Reach management (www.reachsolarenergy.com.au) have a proven track record with development, large-scale capital raising and operations, for both energy and infrastructure projects in across Australia and internationally.

In mid 2017, Reach raised \$500m of project finance for Bungala One and Two, 2 x 110MWac solar PV in South Australia. Reach is currently developing 450MWac as the first stage of a 900MWac solar PV and 70MWh energy storage consented site in NSW, and sub 5MW distribution-connected batteries in South Australia.

Reach comments on the Regulations are as follows:

Energy Security Target

Reach agrees with the “Department’s” position on reserve margin, maximum demand and firm capacity although please explain what is meant by “It will differ from AEMO’s project commitment framework”.

Electricity Infrastructure Investment Safeguard

Reach agrees with the “Department’s” position and regulation principles for the reliability standard and requirements for competitive tenders for long term energy service agreements.

Infrastructure investment objectives report. Reach consider the list of matters the Consumer Trustee should take into consideration is comprehensive. Regarding question 5, the reliability standard and demand/ supply (including demand side management) outlook should inform if long-duration energy storage is required or not i.e. short duration energy storage may be adequate.

Classification of REZ network infrastructure

Reach made a comprehensive submission to the NSW Government on 30 April 2021 on CWO REZ Access scheme issues paper. Please refer to the same.

Definition of REZ network infrastructure project in the EII Act. "Open access" connection remains a foundation principle of National Electricity Law that governs the National Electricity Market. There are existing rules and regulations in place, subject to review and approval by the AER, to cover upgrade of existing transmission networks. Reach consider these should remain unaffected by new REZ transmission lines and/ or REZ projects.

I hope the NSW Government (Planning) find the Reach response useful in forming its views on the Regulations. Reach considers the policy is important and please do not hesitate to contact me if you have any questions.

Yours faithfully,



Tony Concannon

CEO

Reach Solar energy

