



12 August 2025

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Energy Policy WA
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Via email: energymarkets@deed.wa.gov.au

Dear Ms Guzeleva

RE: Allowable Revenue Framework Review (AEMO)

I am pleased to provide this submission on behalf of Collgar Renewables (**Collgar**). As an operator committed to best practice and the continued evolution of a reliable and secure power system, Collgar welcomes the opportunity to review and comment on the Allowable Revenue Framework Review Consultation Paper.

We appreciate the comprehensive and consultative approach adopted in developing the proposed framework. In our view, the proposals are generally well considered, and we are broadly supportive of the direction set out in the consultation paper. Our comments below are intended to provide constructive feedback and suggestions to further strengthen the framework.

Whilst the proposals are well considered, they would impose a significant administrative burden on AEMO. Whilst this additional effort may be offset by project and BAU cost savings, it is important to ensure the increased process rigour delivers genuine efficiencies rather than simply adding to AEMO's workload and overall costs.

Collgar For clarity, we have not provided specific commentary on every proposal; where no specific commentary is included, Collgar is generally supportive of the proposal as outlined.

We would be happy to discuss any aspect of this submission in more detail with you, should you have any questions.



Table.1: ARF Review proposals

Proposal	Comments
Proposal 1.1	Support aligning reputational incentives with AEMO's governance framework.
Proposal 1.2	Critically required for transparency.
Proposal 2.1	Support the ERA reviewing BAU (& non-BAU expenditure).
Proposal 4.1	Support the ERA preparing a guideline setting out required information.
Proposal 5.1	Support AEMO sharing their project plans, including aligned to their governance plans.
Proposal 6.3	<p>We support the concept of a review of each project plan.</p> <p>We propose that the ERA undertakes this review, rather than establishing another independent body.</p> <p>The ERA is an independent body with vast experience in undertaking these functions efficiently. It would be inefficient to create another body when the market is striving to reduce cost.</p>
Proposal 8.1	Recommend some flexibility for projects that are deemed by the ERA to be high priority or emergency.
Proposal 11.3	Support the additional transparency.