



Commonwealth Bank of Australia

Australian Competition and Consumer Commission
Attn: Daniel McCracken-Hewson, General Manager Merger Investigations
GPO Box 3131
Canberra ACT 2601z

By email: Brookfield-Origin-Merger@acc.gov.au

27 June 2023

Dear Mr. McCracken-Hewson

Market Inquiries Letter - Proposed Acquisition of Origin Energy

We refer to the ACCC's market inquiries letter dated 9 June 2023 in relation to Brookfield and MidOcean's proposed acquisition of Origin Energy.

The Commonwealth Bank of Australia thanks the ACCC for an opportunity to make a submission. In particular, we wish to comment on the public benefits concerning investment and decarbonisation, rather than responding to individual questions in the market inquiries letter. We acknowledge our commercial interests in this area, including commercial relationships with Brookfield and Origin Energy.

The Commonwealth Bank of Australia publishes an annual Climate Report, which we make publicly available on our website. That Report shows that our approach to climate change is being embedded in our strategy, and one of our key priorities is to play a leading role in supporting Australia's transition to a modern, resilient and sustainable economy.

Australia's transition to a net zero emissions economy by 2050 presents a significant opportunity for our country. We support a coordinated transition that identifies new investment opportunities and financial support for people and communities who will be most impacted.

We recently welcomed Australia's updated national goal of achieving a 43% reduction in greenhouse gas emissions by 2030, compared to 2005 levels. We believe the new target is ambitious but achievable for Australia. We note that, in pursuit of this target, the Australian Government is targeting 82% renewables by 2030.

When considering how we can collectively decarbonise our economy, Australia is fortunate to have a range of available opportunities, including decarbonisation of our electricity grid through increased investment in solar, wind, storage, hydro and hydrogen. The investment required is substantial, and it is likely that Australian industries will need to compete with the rest of the world to attract investment for their decarbonisation journey. We expect that competition for international capital aimed at decarbonisation will intensify in coming years.

The Merger Authorisation Application dated 5 June 2023 identifies a range of public benefits, including the "high degree of certainty that the [Brookfield Global Transition Fund I] Consortium will make the investment of \$20 to \$30 billion to materially decarbonise the Origin Energy Markets business by 2033."

CBA commends this commitment as an example of the material contribution to Australia's climate goals that can be achieved through private investment.

While we appreciate the proposed investment in renewables is only one aspect of a complex proposal, we regard that aspect as an important step in Australia's transition to a net zero economy by 2050. The proposed transaction creates an incentive for an investor of the size, capability, experience and credibility of Brookfield to opt to invest in renewables in Australia in a meaningful manner, notwithstanding opportunities to invest elsewhere in the world. The scale of the commitment to decarbonise a company in a carbon-intensive industry sets a high bar and potentially forges a path for others.

We would be pleased to provide any further information, if requested.

Yours sincerely,



Pablo Roa
Executive General Manager
Group Treasury, Financial Services