

23 May 2019

Ms Suzanne Falvi
Executive General Manager
Security and Reliability
Australian Energy Market Commission
PO Box A2449

Electronic Lodgement: ERC 0257

Consultation Paper – Transparency of new projects

Dear Suzanne,

Energy Networks Australia welcomes the opportunity to provide a submission to the Australian Energy Market Commission (AEMC) on the Consultation Paper, Transparency of new projects rule.

Energy Networks Australia is the national industry body representing Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

This consultation combines three rule changes aimed to increase transparency of generators connecting to the electricity system. These proposals are outlined below;

- **AEC** seek to increase the transparency of new project information in the NEM to enable better forecasts. The intent of the AEC rule change is improve the accuracy of the AEMO Generator Information page;
- **AEMO** seek to allow a developer to register as an intending participant for generation or load, allowing the intending participant access to NEM information that would be available to a person intending to register as a market participant; and
- **Energy Networks Australia** seek to allow TNSPs to publish certain information they have received from connection applicants regarding new and proposed connections.

TNSPs are currently processing an unprecedented level of connection activity. As a result, the connection process now more often involves multiple proponents seeking to connect in similar locations at similar times moving along different timeframes

making the assessment of technical requirements, connection, network and system planning processes more complex.

Energy Networks Australia supports the increased transparency offered by these rule changes and sees the three proposals as complementary.

The AEMC highlights the need for better coordination in the Consultation Paper and suggests that Energy Networks Australia considers greater coordination is *likely* as generators seek ways to manage system strength obligations and other issues, for example marginal loss factors. For clarification, we consider the proposed rule will remove a barrier in the regulatory framework for coordination which will then provide the opportunity for greater coordination by generators.

Underlying competitive tensions and commercial challenges may influence whether generators are likely to coordinate in practice.

These rule changes seek to enable the best possible framework to improve transparency and allow coordination of the significant volume of connections transmission networks are processing.

Should you have any queries on this response please feel free to contact Verity Watson, vwatson@energynetworks.com.au.

Yours sincerely,



Andrew Dillon

Chief Executive Officer