

17 October 2018

Mr Mark Wilson  
Senior Technical Advisor  
Australian Energy Regulator  
GPO Box 922  
Adelaide 5001

cc: AERInquiry@aer.gov.au

## Draft Transmission Annual Planning Report Guideline

Dear Mr Wilson,

Energy Networks Australia welcomes the opportunity to provide a submission to the Australian Energy Regulator's (AER) Consultation Paper on its Draft Transmission Annual Planning Report (TAPR) Guideline ("the Guideline").

Energy Networks Australia is the national industry body representing businesses operating Australia's electricity transmission and distribution and gas distribution networks. Member businesses provide energy to virtually every household and business in Australia.

Energy Networks Australia welcomed the opportunity to meet with AER staff on 15 October and believe there are a number of matters within the current guideline that would benefit from additional clarity as outlined below. Energy Networks Australia would also appreciate the opportunity to work with the AER to further improve the guideline and template before its final publication.

### ***New Connections - Confidentiality***

The Guideline sets out additional information requirements which it proposes to apply to 2019 TAPRs, including new connections data. Specifically, the AER has proposed TNSPs publish the following information for new connections:

- » For generation – proposed generator size and technology and approximate location for every connection enquiry and application.
- » For loads – proposed load size and forecast duration curve and the approximate connection location for every connection enquiry and application.

TNSPs have concerns with the provision of this information as it considers the new connection information set out in section 4.1.3 of the Guideline is confidential information under the National Electricity Rules (NER). In particular, TNSPs considers these potential requirements cannot be provided under clauses 5.3.8 (Provision and Use of Information) and 8.6 (Confidentiality) of the Rules.

Energy Networks Australia has previously raised these confidentiality concerns with the AEMC in regard to TNSP coordination of REZ's and consider that there are benefits for the overall power system and consumer benefits from sharing information which could occur with the significant transformation of the grid.

***Additional clarity and consistency between the guideline and the templates***

Energy Networks Australia considers that the templates and Guideline would benefit from additional clarity and consistency before the AER publishes its final Guideline. The following provides a few specific examples that need to be addressed:

- » The term constrained in the transmission connection point template suggests that this template is intended to provide clarity for future transmission work that is augex related, although constraint drivers which include asset condition and safety are inconsistent with this approach. It would be useful if the AER clarified exactly which transmission connection points are required. If this does include non-constrained transmission connection points, then clarity on which fields are required to be completed would assist.
- » There could be better alignment between the text in section 4 and the relevant template data fields, e.g. constraint primary driver, customer number, unplanned outage etc.
- » Energy Networks Australia considers that risk based quantification for repex, and not just augex, is appropriately undertaken in a RIT-T, given the significant amount of work required. We do not consider that it is either appropriate or proportionate to undertake such analysis for TAPR purposes.

***Allow flexibility to roll in the historical data***

With respect to the historical data obligation, Energy Networks Australia considers that this data also potentially raises confidentiality issues. An alternative approach may be for the AER to consider whether data already provided in RIN returns could be used in the first instance.

If the AER continued with the historic data obligation, Energy Networks Australia consider that TNSPs should have the flexibility to roll in one year of historic data at a time. Some TNSPs might not have captured this data well or at all, and may need to amend its current data collection and reporting arrangements.

Should you have any additional queries, please feel free to contact me on 03 9103 0407 or [vwatson@energynetworks.com.au](mailto:vwatson@energynetworks.com.au).

Yours sincerely,



Dr Stuart Johnston  
GM, Network Transformation