



Meridian Energy Australia Pty Ltd  
Level 15, 357 Collins Street  
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Australian Energy Market Commission  
PO Box A2449  
Sydney South NSW 1235

Ref: ERCo258

### **Early implementation of ISP priority projects - Proposed rule change**

Meridian Energy Australia Pty Ltd and Powershop Australia Pty Ltd (**MEA Group**) thank the Australian Energy Market Commission (**AEMC**) for the opportunity to comment on the Energy Security Board's (**ESB**) proposed rule change concerning the early implementation of ISP priority projects (AEMC reference ERCo258) (**Rule Change**).

As with all proposed rule change requests that lead to an increase in the costs associated with regulated transmission assets, MEA Group is mindful that such increases in cost are ultimately borne by the consumer. Lowering costs and providing cheap, reliable power to its customers is extremely important to MEA Group.

Noting the above, MEA Group agrees that the Rule Change aligns with the COAG Energy Council's request for the ESB to report on how the Group 1 projects in the Integrated System Plan (**ISP**) could be delivered as soon as reasonably practicable. Whilst the AEMC determined not to invoke its Last Resort Planning Powers (**LRPP**) under the NER to require Transgrid and AEMO to publish the RIT-T for Queensland-NSW Interconnector (**QNI**), in MEA Group's view there was genuine concern that the potential inter-regional constraints between NSW and Queensland had to be addressed as a matter of urgency.

Given the need for these minor projects, it is appropriate that on this occasion the TNSP be afforded the opportunity to submit a contingent project application concurrently with the RIT-T application.

MEA Group agrees that the issues raised in the ESB's submission are genuine and may result in an implementation date that is beyond the date required for this project to be operational. In respect of whether the Rule Change addresses the issues raised, MEA Group is concerned that despite the Rule Change there remains a residual risk that the QNI will not be completed ahead of 2022 when the perceived need is expected to arise.

If you have any queries or would like to discuss this matter further please do not hesitate to contact me.

Yours sincerely,

**Angus Holcombe**  
Head of Asset Development  
Meridian Energy Australia