

25 March 2021

Carlos Dias
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Via online submission

Dear Mr Dias

RE ERC0324 – Minor changes 1 2021

TasNetworks welcomes the opportunity to respond to the Australian Energy Market Commission's (**AEMC's**) consultation on the Minor changes 1 rule change proposal.

TasNetworks is the Transmission Network Service Provider (**TNSP**), Distribution Network Service Provider (**DNSP**) and Jurisdictional Planner in Tasmania. TasNetworks is also the proponent for Marinus Link, a new interconnector between Tasmania and Victoria. The focus in all of these roles is to deliver safe, secure and reliable electricity network services to Tasmanian and National Electricity Market (**NEM**) customers at the lowest sustainable prices. Across all of its roles, TasNetworks supports consistency and clarity with the rules.

TasNetworks notes that there is an error with clause 5.16A.4(d)(8) in the Minor changes 1 rule change proposal. This clause was recently amended as part of the *National Electricity Amendment (Simplification of NER definitions) Rule 2020 No.17*. Under the Simplification of NER definitions rule change, this clause has the terms "preferred option" and "RIT-T proponent" italicised and transposed. While the terms being italicised were correct, the terms did not need to be transposed.

TasNetworks notes that clause 5.16A.4(d)(8) is down to be amended under the Minor changes 1 rule change proposal. However, the proposed amendments will not rectify the earlier typographical error. In the *Draft National Electricity Amendment (Minor changes 1) Rule 2021* the amendments to clause 5.16A.4(d)(8) are listed as:

'[39]Clause 5.16A.4 Regulatory investment test for transmission procedures

In clause 5.16A.4(d)(8), omit "preferred option" and "RIT-T proponent" and substitute "preferred option" and "RIT-T proponent", respectively.'

However, the terms are already italicised, but rather need to be transposed to the way they were prior to the Simplification of NER definitions rule change. The correct amendment to this rule is:

[39]Clause 5.16A.4 Regulatory investment test for transmission procedures

In clause 5.16A.4(d)(8), omit "for the proposed *RIT-T proponent* identified under subparagraph (7), the *preferred option* must provide:" and substitute "for the proposed *preferred option* identified under subparagraph (7), the *RIT-T proponent* must provide:"

Should you have any questions, please contact Kathryn Deeley, Regulatory Analyst in Regulation, via email (kathryn.deeley@tasnetworks.com.au) or by phone on (03) 6271 6254.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Astley', with a horizontal line extending to the right from the end of the signature.

Tim Astley

Network Reform and Regulatory Compliance Team Leader