

Concessional Finance for Transmission Network Service Providers

STAKEHOLDER FEEDBACK TEMPLATE

The template below has been developed to enable stakeholders to provide their feedback on the questions posed in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to assist it to consider the views expressed by stakeholders on each issue. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

ORGANISATION:

CONTACT NAME:

EMAIL:

PHONE:

DATE

PROJECT DETAILS

NAME OF RULE CHANGE: **Concessional Finance for Transmission Network Service Providers**

PROJECT CODE: **ERC0349**

PROPOSER: **The Honourable Chris Bowen MP, Minister for Climate Change and Energy**

SUBMISSION DUE DATE: **14 July 2023**

CHAPTER 2 – THE PROBLEM RAISED IN THE RULE CHANGE REQUEST

1. The regulatory treatment of concessional finance

Do you agree that the Rules need to recognise concessional finance to share benefits with consumers?

CHAPTER 3 – THE PROPOSED SOLUTION AND IMPLEMENTATION

2. Responsibility to inform the AER about the existence of a concessional financing arrangement

Do you agree that the TNSP should notify the AER about the existence of a concessional finance arrangement?

3. What types of information about the concessional finance arrangement should be provided to the AER and by whom?	
Do you agree with the types of information that should be provided to the AER, as detailed in the rule change request, and that the TNSP be required to provide the information?	
4. How the AER confirms the intent of the concessional finance and the method(s) through which the AER can treat the concessional finance benefits	
1. Do you agree that the AER should confirm the amount to be treated as a benefit to consumers and/or TNSPs with the TNSP and the GFB?	
2. Do you agree that this amount should be treated as either a capital contribution and deducted from the RAB or as a MAR adjustment? Do you prefer one method over another? Why?	
3. Do you see any issues with treating some or all of the benefits as either a capital contribution or as a revenue adjustment?	
4. Do you agree the AER should be required to seek submissions from the government funding body: <ul style="list-style-type: none"> • To ensure benefits are passed on to customers and/or TNSPs as intended, and • to determine whether they intended that some or all of the benefit of the concessional finance be treated as a capital contribution or a MAR adjustment, if required? If not, how should the AER confirm intent and treatment of consumer benefits?	
5. Proposed solution	
1. Do you think the proposed solution is the most appropriate way to share benefits of concessional finance with consumers, or is there another more effective solution that could be implemented (including non-	

rules based solutions)?	
2. Do you think the proposed solution:	
a. is targeted, fit for purpose and proportionate to the issues it is intended to address?	
b. considers the broader direction of reforms in transmission infrastructure?	
c. provides for simplicity and transparency in regulatory arrangements?	
6. Costs and benefits of the proposed solution	
What do you think the direct and indirect costs and benefits of the proposed solution are likely to be? Are the costs likely to be proportionate to the problem they are intended to address?	
7. Implementation considerations	
1. Do you have any suggestions regarding the commencement timeframe?	
2. Are there additional measures that should be considered that would support the effective implementation of the desired solution?	
8. Compliance and enforcement	
Do you have any feedback on the compliance and enforcement role proposed for the AER?	
9. Are there alternatives solutions that would be preferable?	
Can you share any alternative solutions that you think would be preferable and more aligned with the long-term interests of consumers?	

CHAPTER 4 – MAKING OUR DECISION

10. Assessment framework	
Do you agree with the proposed assessment framework?	