

12 February 2024

Ms Anna Collyer
Chair
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2001

Ref: ERC0382

Resetting Powerlink's System Strength Unit Price's – Consultation Paper

Dear Ms Collyer,

Energy Networks Australia (ENA) welcomes the opportunity to make this submission in response to the Australian Energy Market Commission's (AEMC's) Consultation Paper on the Resetting of Powerlink's System Strength Unit Price (SSUP).

ENA represents 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.

ENA appreciates the AEMC's efforts to expedite this Rule change request with a view to a Final Determination on 14 March 2024, allowing Powerlink a one off reset of the SSUP's to be published on 15 March 2024, or no later than 14 April 2024. These timeframes could allow the revised SSUPs to be published on 15 March aligned with the normal transmission charging publication.

ENA supports the participant derogation for a one off reset of the Powerlink SSUPs in light of more compelling cost information becoming available. This change would help to ensure that connection proponents can make efficient choices between self-remediation or paying the system strength charge.

Allowing a one off reset for Powerlink's SSUPs to incorporate new information and lower the SSUPs will facilitate the connection of inverter-based resources and the efficient choice of system strength arrangements.

ENA supports the AEMC's position that this is a one-off reset. Whilst Powerlink will endeavour to publish the updated SSUPs the day following the final rule, we note they only have one month to update the SSUPs. The next revision for SSUPs takes effect on 1 July 2028, other than annual Consumer Price Index (CPI) adjustments.

On the basis that the AEMC and Powerlink meet the dates in the indicative rule drafting, ENA supports the arrangements proposed for advising proponents with existing connection enquiries and also providing an opportunity for connection applicants who have elected not to pay the system strength charge to amend their choice on the basis of the new SSUPs.

The notification of a proponent to change its election in 11.164.3 (b) may be better linked to the publication date of the revised SSUPs than the effective date the rule is made. This would

preserve the connection applicant's 20 business days timeframe to consider the revised SSUP and system strength charges in relation to their self-remediation options under consideration. It is important that connection applicants have the necessary information at hand for the 20 business days to consider their options.

We look forward to the Final Determination. In the meantime, if you would like to discuss this submission, please contact Verity Watson (vwatson@energynetworks.com.au) in the first instance.

Yours sincerely

A handwritten signature in blue ink that reads "Dom Adams".

Dominic Adams
General Manager Networks