

16 April 2024

Tiffany O'Keefe
Project Leader
Australian Energy Market Commission
Submitted online

Dear Tiffany,

Enhancing investment certainty in the R1 process

TasNetworks is the Tasmanian transmission network service provider (TNSP) and distribution network service provider (DNSP) and welcomes the opportunity to contribute further to this project. TasNetworks acknowledges the collaborative and constructive approach adopted by the AEMC in arriving at its draft determination and Rule.

TasNetworks supports Energy Networks Australia's submission and makes the following contributions.

This part of the connections process is important in supporting the timely transition of the national electricity market. We broadly support the draft Determination and Rule and consider that it makes practical improvements to the existing framework while retaining key design principles of the national electricity market, namely ensuring power system security and quality of supply for network users.

The connections process needs to maintain the network's integrity, safety, and reliability and should appropriately allocate risks to the parties best able to manage them (i.e. between connecting parties and the network service provider). We consider the AEMC's draft Determination and Rule achieves these objectives, while providing for improved flexibility and facilitating engineering judgement (i.e. in clause 5.3.4A(b)(1A)(i) of the draft Rule).

We consider that the key new clause – 5.3.7A – is a reasonable approach, placing the onus on the connecting party to provide adequate data and information to assess plant capability. However, the drafting of this clause could be improved to clarify the nature of 'adequate' data and information¹ and/or the distinction between the "capability of the Connection Applicant's generating system"² and the "capability of the generating system to meet or exceed its performance standards"³. That is, the drafting should improve clarity on specifically what more there is to assess beyond the capability of the system to meet or exceed its performance standards in order to assess the capability of the system.

¹ referred to in 5.3.7A(d)(1).

² referred to in 5.3.7A(a) and (c).

³ referred to in 5.3.7A(a) and (d)(1) with the latter being with reference to preconditions for the connection applicant before it can request clarification.

For example, the draft Determination describes the capability of the generating system as related to whether the plant's design has changed and/or any changes in the external network conditions post the execution of the connection agreement. This could be captured in the Rules to improve clarity.

Further, consistent with the draft Determination, we would suggest the drafting of amended clause 5.3.4A(b)(1A)(ii) could be improved to clarify that the 'below the minimum access standard' only applies to legacy generators. Without this clarification, it appears as though new connections' performance standards could be below the minimum access standard, which is not considered to be intentional or desirable.

Please contact [REDACTED] to discuss this submission.

Yours sincerely

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Chantal Hopwood
Head of Regulation