

# Scale Efficient Network Extensions

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Background and issues this Rule change is seeking to address

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# Purpose of this presentation

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- Outline the background to this Rule change request
- Highlight the key issues this Rule change is seeking to address
- Clarify the objective of SENEs
- Summarise the proposed Rule change
- Discuss some of the challenges in implementing the proposed frameworks



# Background to this Rule change request

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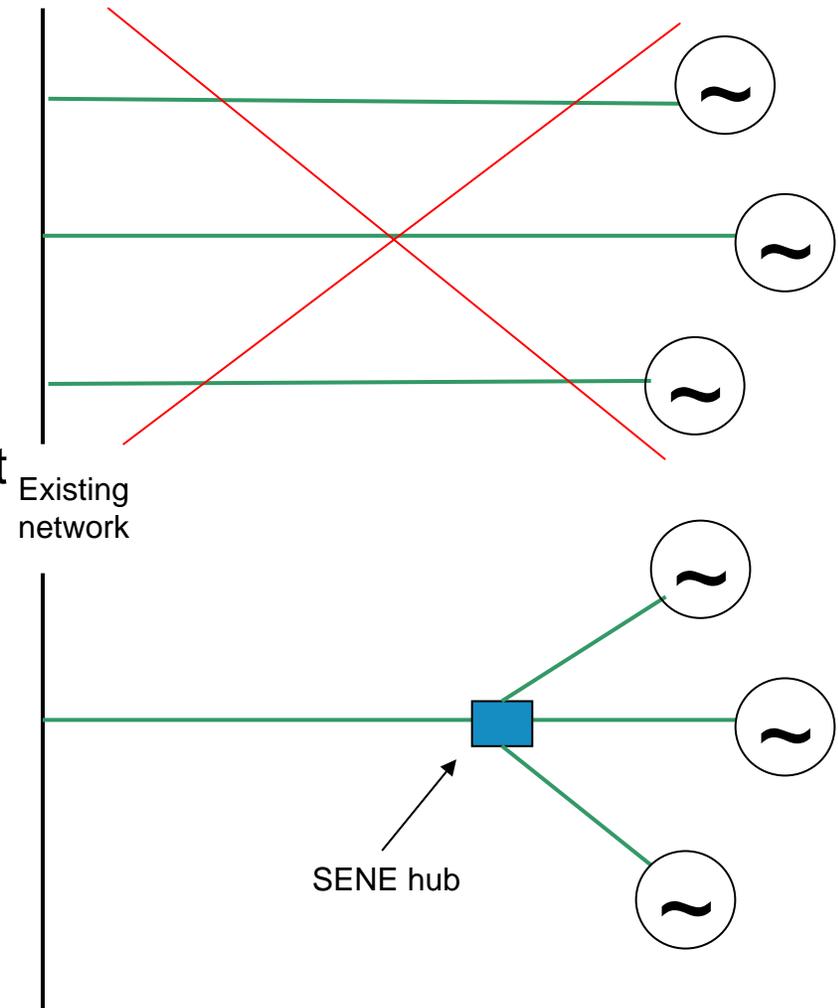
# Review of Energy Market Frameworks in light of Climate Change Policies: findings

- The MCE requested the AEMC conduct a review of energy market frameworks in light of climate change policies
- Patterns of generation investment are changing
- Existing frameworks require strengthening to manage these changes



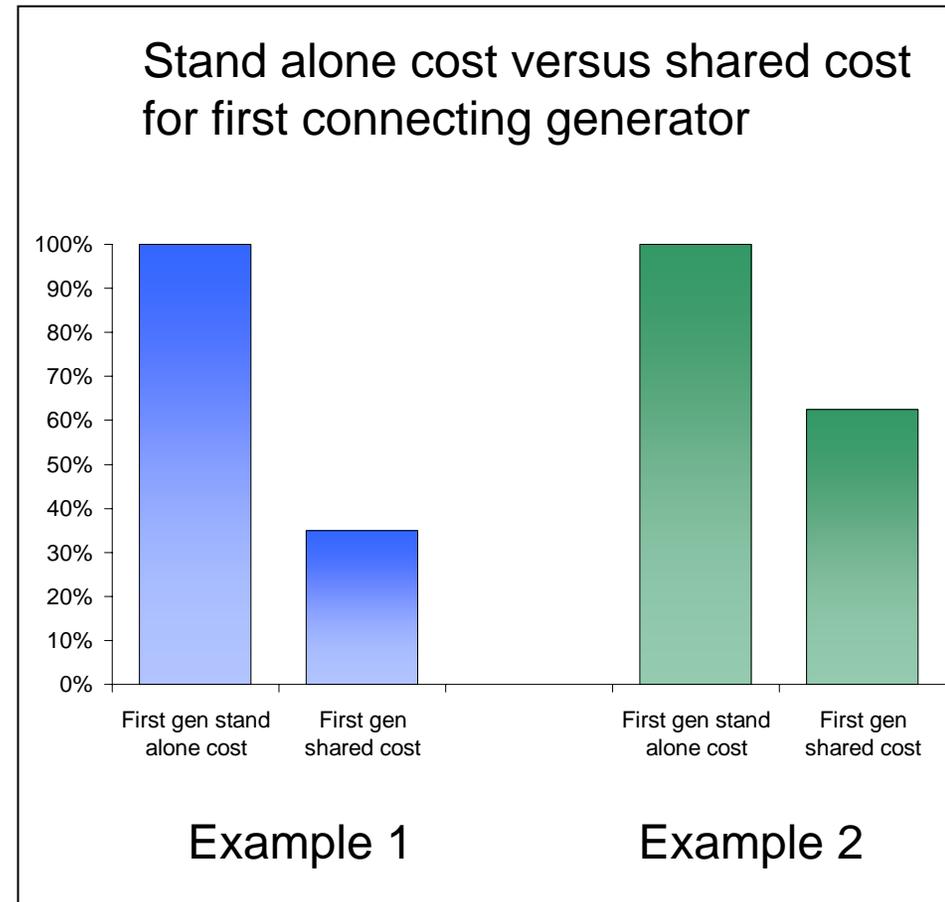
# Review of Energy Market Frameworks in light of Climate Change Policies: recommendations

- A new framework to promote the efficient connection of clusters of new generation in proximate locations over time: SENEs
- Provides a mechanism to allow forward looking network investment for generation connection
- Generators pay an average cost charge for use of the SENE
- Requires customers to underwrite the risk of asset stranding



# Illustrative examples of opportunities for scale efficiencies

- Magnitude of efficiency gains depend on :
  - number and volume of gens
  - geographical spread of gens
  - distance from shared network
- *Example 1*: Coordinating connections for 4 generators over 35km of line would save a total of \$12m Citipower/Powercor
- *Example 2*: coordinating connection of 2000 MW of generation would save the first connecting 500 MW generator \$75m Grid Australia



# The SENE Rule change request

- MCE endorsed the recommendation and submitted a Rule change request
- MCE considered the proposal should promote the NEO by:
  - overcoming the risk of inefficient asset duplication
  - ensuring efficient assets are built
  - minimising risk to consumers



# Consultation on this Rule change to date

- 28 submissions, 2 supplementary submissions received on the Consultation Paper
- A shift away from more widespread support for SENEs
- Still some need for change
- Concerns with the proposed Rule:
  - level of risk imposed on customers
  - complexity of the proposed Rule
  - implications for competitive neutrality between generators



# Interaction of this Rule change with the TFR

- MCE has directed the AEMC to conduct a review of transmission frameworks
- The scope of SENEs and the TFR may overlap
- The AEMC has decided to progress the SENEs Rule change independently
- However, the scope of the TFR will be a consideration in considering any potential Rule change to accommodate SENEs





# Nature of the problem

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Issues this Rule change is seeking to address

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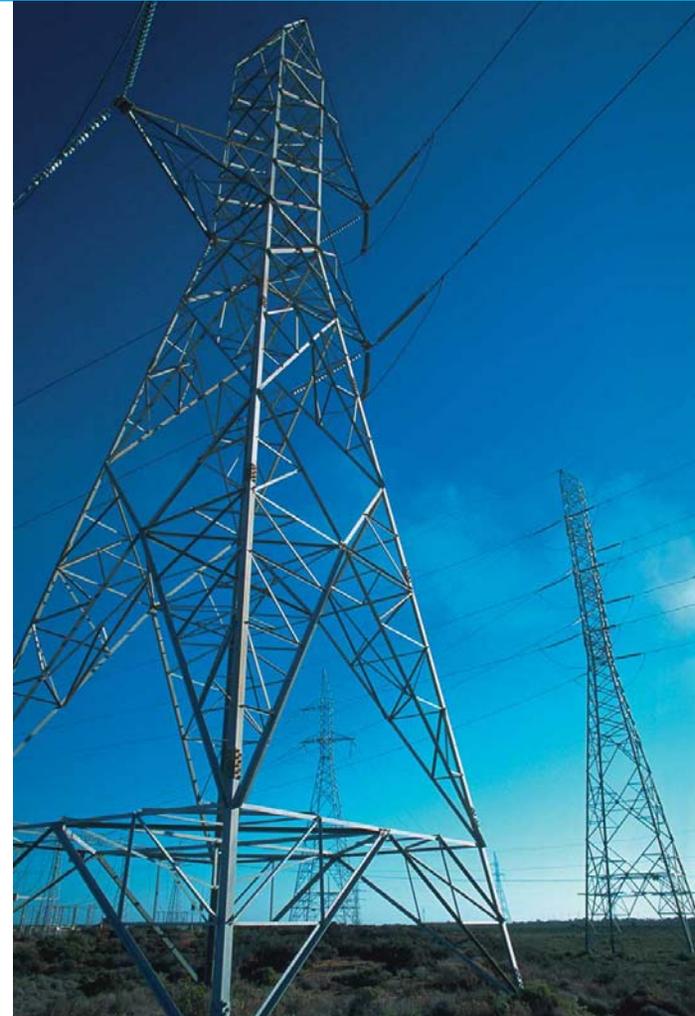
# Patterns of generation investment are changing

- The scale of generation investment is changing
- New technologies have different characteristics from past generation investment:
  - relatively small compared to “lumpy” network investment for connection
  - some low cost sources of generation are remote from existing networks
- New generation may be clustered and seek connection over a period of time



# Connecting new types of generation is challenging

- The economies of scale in network investment imply coordinating generation connection will lower total system costs
- Achieving efficient connection outcomes is challenging because:
  - coordination challenges
  - the temporal nature of the problem
  - managing the risk of stranded assets
- Achieving optimal investment outcomes requires an entity to bear the asset stranding risk



# Connecting new types of generation is challenging

- The existing arrangements are unlikely to allow efficient outcomes for new patterns of generation
- No entity has an incentive to provide forward looking investment for connections
  - The existing frameworks do not encourage or reward speculative building of network assets
- This may lead to inefficient outcomes, including:
  - duplication of network assets
  - delays in connection





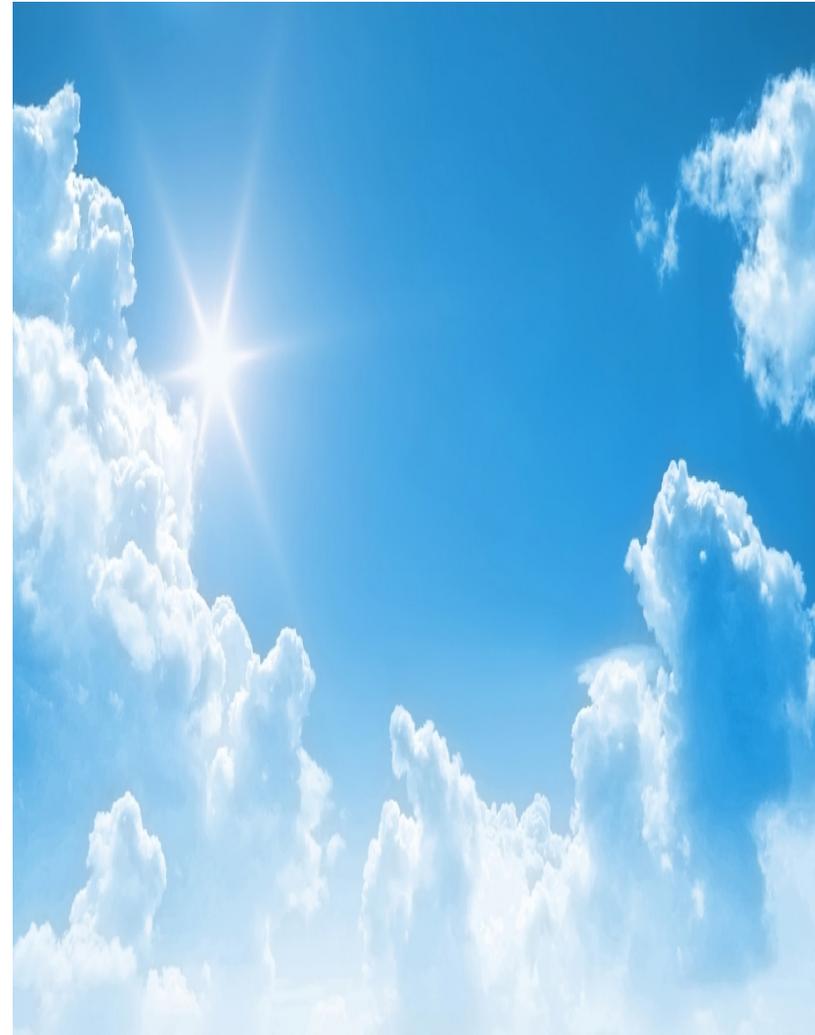
# Objective of SENEs

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# The purpose of this Rule change request

*To allow the efficient connection of multiple generators with multiple owners in proximate areas over time and to charge an efficient price for that service*





# Summary of the Rule change request

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# The proposed Rule change

## Trigger for considering a SENE

- AEMO to identify *possible* SENE zones in its annual NTNDP
- NSPs to identify credible options in their APR or on their website

## Investment test

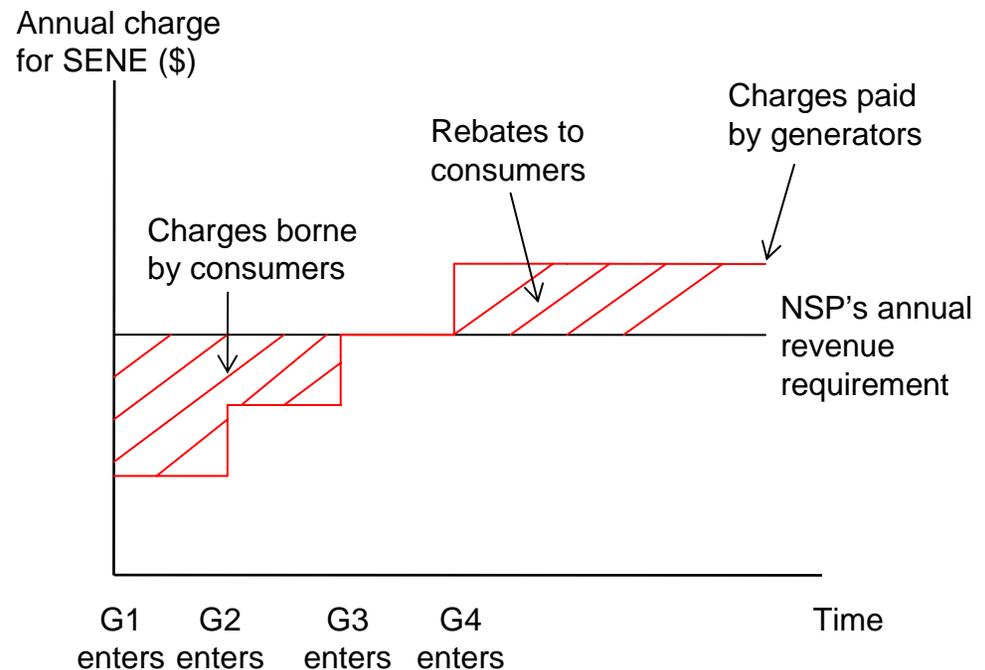
- NSPs to consider opportunities for scale efficiencies and, if so, publish:
  - Planning report
  - Standard connection offer
- Construction of the SENE triggered by connection agreement with at least one generator



# The proposed Rule change

## Cost allocation and charging methodology

- Generators pay an average cost charge for use of the SENE
- Customers underwrite any remaining costs



The shaded areas will be equal if generation connects as expected

# The proposed Rule change

## Access provisions

- Generators are entitled to compensation where constrained off by another generator

## Regulatory oversight

- AER prepares guidelines
- AER has the ability to veto the connection offer
- Forecasts to be reviewed by AEMO
- A policy review to be undertaken by the AEMC 5 years after commencement





# Challenges in implementing SENEs

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# Implementation challenges

- The existing connections framework was developed to meet historical requirements
- We now seek to allow different types of generation to connect using shared assets
- SENEs, as proposed, do not fit naturally within existing frameworks
- This creates additional complexity for any SENEs framework



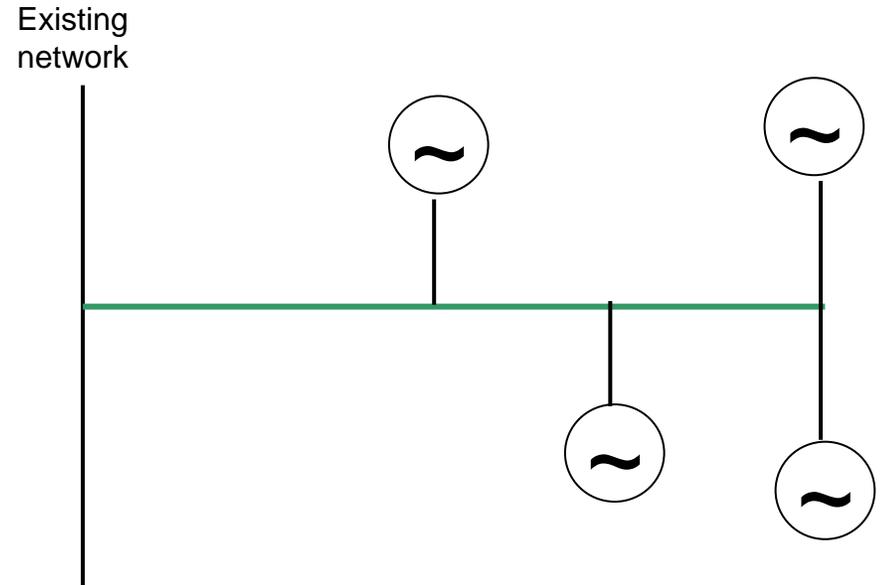
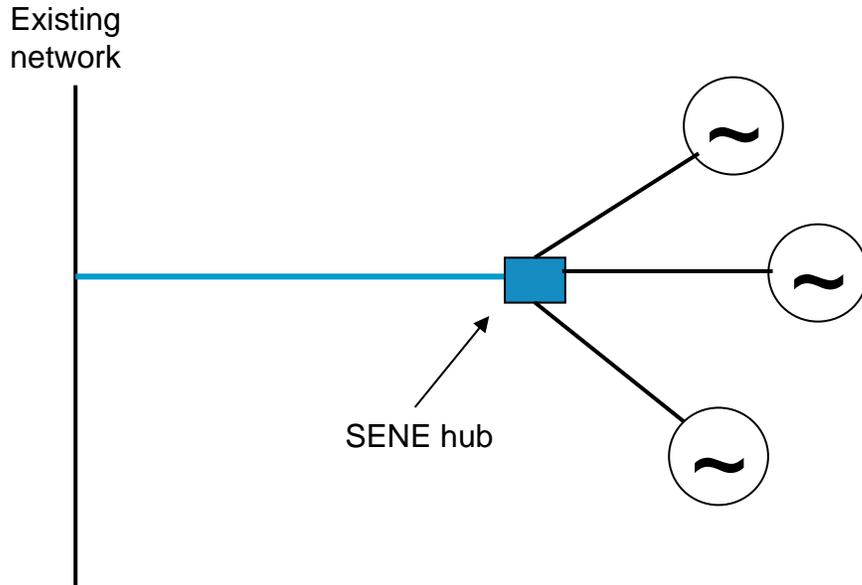
# Implementation challenges – examples from proposed framework

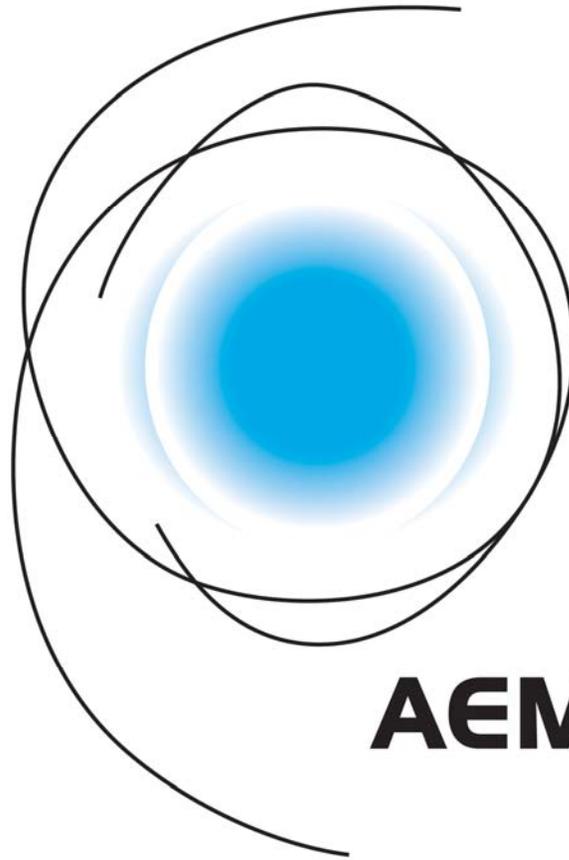
- Connection assets are typically funded by generators, but SENEs require initial customer funding to allow forward looking investment
- The Rules do not envisage assets that were once funded by customers subsequently being funded by generators
- The proposed Rule defines a SENE as being part of the network but it is treated differently from the remainder of the network



# Implementation challenges – a single framework for many different configurations

Every SENE is likely to be unique





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