Your Ref: EPR0087

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Rupert Doney
Australian Energy Market Commission
Submitted online: www.aemc.gov.au

Dear Rupert

Submission: Consultation Paper on Transmission Planning and Investment Review

CS Energy welcomes the opportunity to provide a submission to the Australian Energy Market Commission's (**AEMC's**) *Consultation Paper – Transmission Planning and Investment Review* (**Consultation Paper**). CS Energy is strongly supportive of the creation of mechanisms that appropriately facilitate the effective and efficient delivery of secure and reliable energy into the future.

About CS Energy

CS Energy is a Queensland energy company that generates and sells electricity in the National Electricity Market (**NEM**). CS Energy owns and operates the Kogan Creek and Callide B coal-fired power stations and has a 50% share in the Callide C station (which it also operates). CS Energy sells electricity into the NEM from these power stations, as well as electricity generated by other power stations that CS Energy holds the trading rights to.

CS Energy also operates a retail business, offering retail contracts to large commercial and industrial users in Queensland, and is part of the South-East Queensland retail market through our joint venture with Alinta Energy.

CS Energy is 100 percent owned by the Queensland government.

Key recommendations

The NEM is inarguably changing and will continue to do so as it transitions to a market with more variable renewable energy (**VRE**) and an overall lower carbon footprint. The ability to effectively and efficiently manage power system security and reliability against this evolving landscape is paramount. CS Energy supports the need to develop regulatory frameworks to unlock any transmission investment that is deemed integral to facilitating this energy transformation at least cost to consumers.

The AEMC's objective to review the current transmission planning and investment frameworks against this backdrop of change is timely. The scale of the energy transformation from the decentralised location of new resources, to the establishment of

Renewable Energy Zones (**REZs**) and the changing demand profile suggests a level of change is required to adapt the transmission infrastructure to accommodate the transition in an efficient manner. It is imperative that transmission projects that are pivotal to the future topology of the NEM are implemented in a timely fashion and assessment frameworks ensure that they appropriately satisfy consumer needs and safeguard against over-investment. Timely investment will stem from investment clarity and certainty, ensuring optimal consumer outcomes and a safe, reliable and secure energy supply.

In this context, CS Energy considers that the scope of this review should be broader and should seek to contextualise the potential role of strategic network investment within the transformation of the NEM.

Scope of review

Assessment of whether the existing transmission planning and investment frameworks will remain fit-for-purpose for this task is crucial. This Consultation Paper represents the first step in this evaluation. CS Energy appreciates that its purpose is to identify and prioritise key issues to be further considered, however, CS Energy is concerned that the scope appears to be limited to making small changes to existing frameworks rather than applying a more holistic lens.

CS Energy suggests that the AEMC could potentially consider the role of networks more strategically and assess holistically how network needs may be required to change to reflect not only the changing location of generation but also the growing misalignment in the timeframes of generation and network investment rather than look to individual project frameworks. The adoption of a more holistic, foundational approach not only acknowledges the scale, scope and direction of the energy transformation but also considers the broader impacts on transmission investment and certainty. While some of these impacts have been identified in the Consultation Paper, CS Energy is concerned that this review is not considering factors that are interrelated with transmission planning and investment such as:

- Roles and responsibilities of key participants – the Consultation Paper discusses the obligations of Transmission Network Serve Providers (**TNSPs**) in the context of planning and investment and acknowledges that there is no obligation to invest. Given the predicted changes, the review shouldn't be constrained in its assessment to existing obligations (or limitations) but rather potentially explore how the role of TNSPs may be able to facilitate some of the desired change.

  Furthermore, not all major transmission projects are expected to be initiated solely by TNSPs; potential projects strategic to the development of the future NEM are identified in the Integrated System Plan (**ISP**) or by jurisdictions providing direct investment in network infrastructure to support REZs. Not only do these investments have a cascading impact on the certainty and potential economic viability of other major transmission projects, they can also have an impact on the role and responsibilities of the TNSP. For some projects, the TNSPs are likely to be the operator of these assets while this may not be true if they become contestable projects. The evaluation of alternatives to the existing frameworks needs to be cognisant of how obligations are, and will be in the future, managed.

- Access regime – in its Terms of Reference, the Consultation Paper specifically excludes access reform based on the separate consideration of this issue by the Energy Security

Board (**ESB**). CS Energy disagrees with this approach and considers it may undermine the veracity of any outcomes of this Review. Access reform is intrinsically linked to transmission planning and investment and cannot be considered in parallel. While this Review should not undertake the detailed access reform work, it must be cognisant of it, otherwise there is a risk that frameworks that are developed as a result of this Review will be sub-optimal, impose additional costs on consumers and result in potential unintended consequences for the NEM.

- Cost recovery and allocation – similarly to the access regime, cost recovery is equally important in providing investment certainty. For example, Transmission Use of System (**TUoS**) charges are allocated on a volumetric basis. In a system that has increasing instances of two-way energy flows, this allocation methodology may not be appropriate. This may also impact on existing cost recovery processes TNSPs undertake through the Australian Energy Regulator (**AER**) and thus investment decisions.

  How the planning and investment frameworks may impact TUoS arrangements is of critical importance to understanding the impact to large consumers. If this is not considered explicitly in the assessment principles, then inefficient outcomes may ensue.

  Cost allocation is also a critical component in assessing the viability of a project. Given the debate on how benefits are attributed, clear rules on cost allocation need to be considered in parallel otherwise investment cases may materially change over time.

Facilitating the transformation of the NEM

Transforming the NEM in a cost-effective way requires the development of a fit-for-purpose framework for transmission planning, investment and access. Prior to progressing work on aspects specific to the frameworks, in CS Energy's view, the AEMC would ideally explicitly consider the following key areas:

1. Clarify the role of the ISP, ensuring this role is appropriately understood and reflected in the National Electricity Rules (**NER**) to provide investment certainty; and

2. Reach agreement on the identification of, and assessment criteria for major transformational projects particularly if those projects are outside of the actionable ISP projects.

Implementation elements, such as appropriate incentives for TNSP-led investment, benefits assessment, cost allocations and timeframes cannot be evaluated and aligned to the appropriate framework unless these two key areas are addressed.

Adopting this approach, in CS Energy's view, will result in a framework that is holistic and one that facilitates required investment clarity and certainty.

(a) The role of the ISP

The inaugural ISP released in 2020 was put forward as the transmission planning '*blueprint that maximises consumer benefits through a transition period of great complexity and uncertainty*'.[1] A clear roadmap for transmission development was considered to build investor confidence, with the ISP presenting the most cost-efficient option for a modern

[1] AEMO 2020 Integrated System Plan Media Release, 30 July 2020

NEM as supported by its purpose specified in the NER.[2] A transmission infrastructure blueprint of this type is critical to facilitate the efficient transition of the NEM.

The ISP replaced the National Transmission Network Development Plan based on the recognition of the scale of change facing the NEM and the complexity and uncertainty attributed to this change. The ISP is integral to transmission investment decisions through the declaration of 'actionable ISP projects' and the need for TNSPs to consider the ISP in their Transmission Annual Planning Report (**TAPR**) and Regulatory Investment Tests (**RiTs**).

However, its exact role in long-term transmission planning is unclear, with the current NER prescription allowing significant changes to be captured by subsequent revisions. For example, in determining the power system needs, 'as it relates to a *NEM participating jurisdiction*, *AEMO* may consider a current environmental or energy policy of that *participating jurisdiction* where that policy has been sufficiently developed'.[3] It is therefore likely that the 2022 ISP will be significantly different to its predecessor, as it will capture the NSW Electricity Infrastructure Roadmap and the Victorian REZ Roadmap. The NSW Roadmap alone plans for 7.6 GW of new VRE capacity that is additional to what was indicated as the least-cost pathway in the 2020 ISP.

Given this, it is not surprising that there is hesitancy in investing in multi-billion-dollar infrastructure. Transmission investments, particularly major transformational projects, are high risk, capital intensive, long term investments. Certainty of their requirement, risk profile and return are fundamental for investment to occur.

In CS Energy's view, the ISP can play two roles:

- The transformational blueprint for transmission planning on which future strategic investment is made, and only changes incrementally over time; or

- A high-level map of a possible transmission network configuration that doesn't underpin infrastructure investment but acts as a guide.

Currently the ISP sits in the middle of these and accordingly is not as effective as it could be. The least-cost option identified in 2020 is likely to be replaced by a more expensive least-cost option in 2022 which represents an overall increased cost to consumers.

The AEMC (and other market bodies) would ideally decide what the enduring role of the ISP should be before it addresses the other challenges identified in this Review. If the ISP is to act as the transformation blueprint (or centralised planning document) it cannot substantially change between publications. The NER should explicitly and emphatically institute the ISP as the centralised planning document. Doing so will then require a clear benchmark to be set as the decision point for future investment in strategic projects with an initial document designated as the benchmark. As per the current regulatory framework, any projects identified in this context would need to demonstrate their value to consumers before proceeding.

The challenge of this approach would be the need for the framework to accommodate how the optimal development pathway may change because of jurisdictional policy. For example, the intent of the NSW Roadmap is to develop sufficient transmission capacity to accommodate 12 GW of VRE and 2 GW of storage by 2030. The grid-connected VRE

[2] National Electricity Rules, Clause 5.22.2
[3] Ibid, 5.22.3

capacity proposed for NSW in the 2020 ISP is 4.4 GW, 7.6 GW less than that should the Roadmap be implemented in full. The optimal development path in the 2020 ISP does not consider this capacity to be in the system. If the network augmentations proposed in the 2020 ISP were developed, some projects may become stranded assets. Investment in new generation can also be impacted by a changing transmission infrastructure blueprint. To address this, one option may be to establish NEM-wide agreement on the optimal development path in the ISP.

CS Energy does not underestimate the complexity of this task, however, if there is no clarity on the role of the ISP, then the transmission network will only incrementally transition to the new generation paradigm and will do so in a way that is inefficient and costly for consumers.

(b) Major transformational projects

Major transformational projects, such as those proposed in the ISP as actionable, may not be best considered under the same framework as business as usual (**BAU**) type projects. This extends beyond actionable ISP projects bypassing the Project Specification Consultation Report (**PSCR**). As identified in the Consultation Paper, BAU projects can be more incremental, more predictable by nature, have historic examples from which risk can be assessed against and are typically less capital intensive. Contrast this to major transformational projects, which have not been undertaken across the NEM since its formation, can be intrinsically uncertain, impacted by external factors and are capital intensive. Naturally, this increases the risk profile of such projects. These differences alongside their strategic nature imply that applying the same assessment criteria to BAU projects and major transformational projects may not be appropriate.

To satisfy the RiT-T and RiT-D a project must demonstrate a net benefit. In some instances, major transformational projects may not be able to demonstrate a quantifiable net benefit in the short to medium term, however, are least cost given their identification as the optimal development path in the ISP or as the result of a strategic decision. The development of major transformational projects is essential for an effective transformation of the NEM. Their development will result in positive market and non-market benefits to consumers in the longer term. This fundamental difference highlights the potential requirement of alternative assessment criteria for major transformational projects. Better alignment of the assessment criteria would and should not compromise the necessary rigor and due diligence of the overall process.

Considering major transformational investments separately to other transmission network infrastructure may reduce the project risk and improve evaluation of a project's return profile by recognising the strategic intent. Removing this uncertainty should also reduce the cost associated with transitioning the NEM, as capital costs will be reduced commensurate with the reduced project risk. Alternative assessment criteria may also facilitate a streamlining of project assessments, while ensuring the appropriate level of governance, as the framework is fit-for-purpose to evaluate such transformational projects on the basis that they demonstrate consumer value. This will ensure the transmission corridors required to facilitate the energy transformation are developed. This seems to echo the intent of actionable ISP projects.

Modifying the assessment criteria for major transformational projects does not imply that other components of the existing regulatory frameworks, such as revenue recovery, are not appropriate. This could be explored further in this Review.

(c) Transmission planning and investment frameworks for non-transformational projects

Making a distinction between major transformational transmission projects and non-transformational projects then allows network augmentations that are more BAU in nature to be assessed through existing RiT-T and RiT-D frameworks including the current assessment criteria.

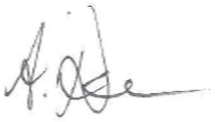
This approach would require consideration of:

- How any proposed framework for major transmission projects are incorporated into, and impact upon, RiT-T and RiT-D assessments that are on-foot;
- Potential impact on the economic regulatory framework, including over or under recovery;
- Assessment of how progressing or not progressing major transformational projects impacts BAU investment of TNSPs, ensuring there is a reasonable time-based notification and transparent assessment of their impact; and
- How TNSP's existing obligations are influenced by progressing or not progressing major transformational projects.

CS Energy's responses to the specific questions in the Consultation Paper are set out in Appendix A.

If you would like to discuss this submission, please contact Andrew Broadbent (Senior Strategy Analyst) on (07) 3854 7377 or abroadbent@csenergy.com.au.

Yours sincerely



Alison Demaria
Head of Policy and Regulation (Acting)

APPENDIX A

INTRODUCTION- ASSESSMENT CRITERIA

1. Do you agree with the Commission's proposed assessment framework for this Review?	The assessment framework is appropriate for traditional major transmission investment processes, however, may not be appropriate or easily utilised for projects driven by jurisdictional policy or actionable ISP projects as outlined previously. While at a high-level the assessment principles are valid, how they are applied to different transmission projects needs consideration as projects driven by policy may not be able to be categorised in the same manner as TNSP-led investment.
2. Are there any additional criteria the Commission should consider as a part of its assessment framework?	As per CS Energy's high-level comments above, assessment criteria should be developed based on the strategic intent of the investment, that is, whether projects are transformative and part of the NEM planning blueprint or seen as incremental. In CS Energy's view, the AEMC should first further clarify the role of the ISP in identifying major transmission projects that are "transformational" and expand on the identification and assessment criteria in the NER that apply to these, as well as the planning and investment framework for other transmission investment.

CHAPTER 3 – ISSUES IN THE REGULATORY FRAMEWORK AND PROCESSES FOR PLANNING OF MAJOR TRANSMISSION PROJECTS

Implications of increased uncertainty for the ex-ante incentive-based regulatory framework	
3. Do you agree with that the identified factors contribute to an increase to the uncertainty surrounding major transmission projects, relative to BAU projects? Are there other factors that should be taken into account?	CS Energy agrees with the factors identified in the Consultation Paper and in particular agree that external factors can routinely change the baseline of a project, even where they are actionable ISP projects.
4. Do you consider that the current ex-ante incentive-based approach to regulation is appropriate for major transmission projects? Why? Are there opportunities to drive more efficient expenditure and operational outcomes?	The current ex-ante incentive-based approach is preferable, however CS Energy acknowledges that this can be challenging in an uncertain environment. The nature of some major transmission projects may mean that these projects are not best served by this approach. This is not helped by the disconnection between transmission planning and generation investment timeframes. The AEMC should further explore the factors contributing to the increased uncertainty in transmission planning to assess whether the ex-ante incentives-based approach is appropriate in this context.
5. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	CS Energy would support further investigation on this issue.

Economic assessment of major transmission projects	
6. Are there opportunities to streamline the economic assessments of ISP and non-ISP projects without compromising their rigour? If so, how could the framework be streamlined?	No comment
7. Do you agree that the RIT-T has a clearer value-add in relation to non-ISP projects? If not, why?	This will depend on the future role of the ISP but generally yes.
8. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	As per comments above.
Benefits included in planning processes	
9. Are the benefits included in current planning processes sufficiently broad to capture the drivers of major transmission investment? Does the scale and pace of the NEM's energy transition necessitate inclusion of other classes of market benefits or wider economic benefits? If so, what kind of other classes of market benefits or wider economic benefits should be included?	CS Energy posits that the planning processes should remain focused on market benefits and the NEO. Broadening the benefit assessment would add further complexity and uncertainty into the process and could potentially duplicate some of the broader benefits already captured by the NEO. It would also form a metric that is difficult to replicate, report and is potentially unbounded. Broader benefits such as those identified in the Consultation Paper are already considered in jurisdictional policy.
10. Are major transmission projects failing to satisfy economic assessments because certain benefits (market or non-market) are not permitted to be quantified?	CS Energy does not consider that major transmission projects are failing to satisfy economic assessments because other benefits are not permitted as part of the quantification. The ISP delivers a least-cost transmission plan to facilitate the energy transformation. Some of these projects may not satisfy the net-benefit required under the RiT-T & RiT-D but still represent the least-cost pathway. As acknowledged in the Consultation Paper, the NEM is changing and will continue to do so, and increased decentralisation of generation will necessitate increased transmission infrastructure. The largest challenge is investor uncertainty particularly as jurisdictions introduce new policies that affect the economic assessment of a project. This challenge is exacerbated by the lack of a Commonwealth co-ordinated targets for renewable energy. Unless there is coordination in targets, there will likely be major transmission projects that cannot satisfy economic assessments. Furthermore, the role of the ISP as a blueprint for transmission planning is unclear, with biennial changes that can be material. Major transmission projects will likely face uncertain economic assessment if the transmission blueprint constantly changes.

11. Are changes warranted to the manner in which carbon emissions inform transmission planning and regulatory processes?	The ISP considers carbon emissions and policy at a system level in its development and thus, CS Energy considers the current process appropriate. These factors are also considered in jurisdictional decisions. Carbon emissions should not inform transmission planning and regulatory processes as this would risk potential duplication when considering costs and benefits. As with carbon emissions, climate and environmental considerations are included at a system level in the development of the ISP. As such, all three should not be considered as an identified benefit (cost).
12. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	No
Guidance on hard to monetise benefits	
13. What classes of market benefits are hard to monetise? Is there a way that these benefits could be made easier to quantify?	The AEMC could do an assessment of which classes of market benefits that are quantifiable under the rules rarely appear in RIT-T submissions. This may be a first step to identify market benefits that are difficult to monetise. Benefits that change substantially between the draft and final assessments may also indicate a difficulty in monetising them.
14. Would guidance on hard to monetise benefits improve the timeliness at which projects proceed through the regulatory process?	No comment.
15. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	No comment.
Market versus consumer benefits test	
16. Do you consider that there are certain changes that have occurred in the energy sector that warrant reconsidering the merits of a market versus consumer benefits test? If yes, what are these changes and why do they require revisiting this issue?	CS Energy considers that market benefits should remain the metric. Given consumer benefits are already captured in the ISP, it would be difficult to avoid duplication if a consumer benefit test is applied.
17. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	No.
Treatment of non-network options	

18. Do you agree that there are barriers for non-network options in economic assessments? If so, do you agree with the barriers identified? Are there any further barriers? How should these barriers be addressed?	Network operators will always have an inherent tension between network and non-network solutions, and this will likely to continue as technologies with new capability enter the market. Transparency in the process could facilitate this as could joint trials to demonstrate the technical performance and capability of technologies. The barriers to considering non-network solutions should be explored further in this Review.
19. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	Yes

CHAPTER 4 – ISSUES IN THE REGULATORY FRAMEWORK AND PROCESSES FOR TRANSMISSION INVESTMENT, FINANCING AND DELIVERY

Balancing TNSP's exclusive right to build and own transmission projects	
20. Are there features of financing infrastructure projects used in other sectors that should be considered in the context of the efficient and timely delivery of major transmission projects?	No comment
21. Should the delivery of transmission projects be made contestable? If not, why?	Given there is no obligation on TNSPs to develop projects, there is scope to make projects contestable as per the framework in Victoria. It may be important to understand the desired contestability of different types of projects to ensure system security and reliability is not compromised. This risk was recognised in the dedicated assets connection rule change which stipulates that radial connections longer than 30 km are dedicated connection assets and form part of the primary TNSPs transmission network. A proponent may build transmission infrastructure to connect to the grid and can retain ownership of the asset, however, the primary TNSP is the operator and the asset owner must have an access policy. The obvious types of projects that could be contestable are interconnection projects which can be privately owned and operated without obscuring TNSP operational obligations. Projects within a region can be more complex if operability of the assets is contestable, particularly if network operations change with the changing system and with the introduction of new obligations such as the system strength planning standard. The following considerations would ideally be explored: • The additional layer of planning and operational complexity that arises where contestable and regulated network projects are co-located within a TNSPs jurisdiction; • How to manage the information asymmetry between a TNSP and other proponents; • Whether roles and responsibilities are clear, transparent, and assigned to the party best placed to manage the risk or deliver the performance obligation. There should be specific consideration of performance obligations that are imposed on TNSPs through existing frameworks and under the NER;

	• How specific performance obligations are impacted and achieved as part of TNSPs connection agreements with proponents. These obligations have proved to be dynamic as the energy transformation continues and future changes in obligations must be considered in the framework; and • Whether contestability of intra-regional assets creates market complexities with the introduction of intra-regional settlement residue auctions.
22. What options, other than changes to the right of TNSPs to provide regulated transmission assets, could be considered to ensure timely investment and delivery of major transmission projects?	Transmission assets should not be built if the business case is not established. Prior to exploring options to ensure the timely investment and delivery of major transmission projects, the barriers to achieving this outcome first needs to be properly understood.
23. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	Yes
Treatment of 'early works'	
24. Do stakeholders seek further clarity on the meaning of preparatory activities and early works?	Transparency in processes is always important.
25. Should the Commission consider how the costs of early works can be recovered?	CS Energy considers the current process as reasonable particularly for projects that are at a later stage at the time of the ISP publication. An area of improvement could be guidance and consistency as to what constitutes early work costs across the guidelines and documentation, and what costs represent core business.
26. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	CS Energy considers this issue has a lower priority relative to the other issues.
Processes for jurisdictional environmental and planning approval	
27. Would additional clarity on cost recovery arrangements for preparatory activities or early work improve a TNSP's ability to meet jurisdictional requirements in a timely manner?	No comment
28. Do jurisdictional planning and environmental requirement intersect with the national transmission planning and investment frameworks in ways that are not discussed above and may require further consideration?	No comment
29. Do you agree that the Review should take forward this issue as a priority issue? If not, why?	No comment

OTHER COMMENTS

30. Please provide any further comment relating to issues discussed in the chapters 1-4 of the consultation paper.	No comment
31. Please discuss any further issues the Commission should take forward in this review in relation to topics covered in chapters 1-4 of the consultation paper.	No comment

TEMPLATE FOR MATERIAL CHANGE IN NETWORK INFRASTRUCTURE PROJECT COSTS RULE CHANGE REQUEST

CHAPTER 5 – MATERIAL CHANGE IN NETWORK INFRASTRUCTURE PROJECT COSTS RULE CHANGE REQUEST

Who should decide whether the RIT-T must be reapplied?	
32. Should this decision remain the responsibility of the proponent or should it be a matter for the AER? Why?	This should be the authority of the AER as it is independent.
33. If the decision remains with the proponent, should the AER have the right to test that opinion?	Yes.
Cost thresholds	
34. Should the NER include a requirement to reapply the RIT, or update analysis, when costs increase above specified thresholds? If so, do you have a view as to what those thresholds should be?	The proponent should reassess only the components of the RIT that have materially changed. CS Energy recognises the complexity and scope of the RIT and so the governance process has to strike the right balance.
35. Do you consider this requirement should apply to all RIT projects or only those above a particular cost threshold/s? If so, do you have a view as to what the threshold/s should be?	Cost thresholds should be tiered to reflect the different nature of projects and the materiality of the project value on the incumbent Regulated Asset Base. Thresholds should also consider the estimated cost of other credible projects that had been considered.
36. Do you have any views regarding the suggested alternative “decision rule” approach?	No comment
37. Should updated project cost data be provided to AEMO to help improve the accuracy of the ISP?	Yes
38. Do you have any other suggestions regarding alternative ways to manage cost increases?	No comment
Requirements when reapplying the RIT	
39. Should the requirement to reapply the RIT be more targeted?	Yes, as per earlier comment

40. Should any additional analysis and modelling that is required to be undertaken be published and subject to public consultation?	Given it is expected that this circumstance would be generally by exception, the additional analysis and modelling should be consulted on.
Trigger to reapply the RIT	
41. Do you have any views as to how the requirement to reapply the RIT should be given effect, including for contingent and non-contingent projects?	No comment
42. Should there be a cut-off point (e.g. once the AER approves the CPA, or once construction commences) beyond which any requirement to update analysis cannot be triggered? If so, what would be an appropriate cut-off point?	No comment
43. Should there be a limit on how many times RIT analysis must be updated?	No comment
Should RIT cost estimates be more rigorous?	
44. Do you consider that the current level of rigour used for RIT cost estimates is suitable? If not, what level of rigour is appropriate? In particular, would it be appropriate to require an AACE 2 estimate (i.e. a detailed feasibility study) for each credible option?	No comment
45. If more detailed cost estimates are required at the RIT stage, should this apply to all RIT projects, or only to larger projects? If so, which projects should be subject to this requirement?	No comment
46. Do you have any other suggestions to address the issues raised in the rule change request?	No comment

OTHER COMMENTS

47. Please provide any further comments on this chapter.	No comment