

2 March 2020

Mr Sebastian Roberts
General Manager – Transmission and Gas
Australian Energy Regulator
GPO Box 520
Melbourne VIC 3001

cc: Jacqui Thorpe, General Manager – Compliance and Enforcement
Richard Khoe

Request for no action to publish a June Transmission Annual Planning Report (TAPR) in 2020

Dear Sebastian

The Energy Security Board (ESB) is progressing a package of amendments to the National Electricity Rules (the Rules) to implement the actionable Integrated System Plan (ISP). The commencement date for these rules is uncertain but is expected to be around late June/early July 2020.

Clause 5.12.2 (a) of the Rules currently requires Transmission Network Service Providers (TNSPs) to publish a TAPR by 30 June each year, while the new rules associated with the actionable ISP will require a TAPR to be published by 31 October each year, to align with the new ISP framework.

Given these circumstances, this is a request for a ‘no action’ letter from the AER with regard to the publication of the 2020 TAPR in June. This is to ensure that TNSPs have confidence that they can immediately align to the ESB’s timing for release of their 2020 TAPRs by 31 October. Energy Networks Australia makes this request on behalf of its TNSP members¹.

Transmission businesses are currently directing resources to develop the 2020 TAPR for publication in June this year consistent with current rule obligations. This is not an efficient nor effective use of resources if the Council of Australian Governments (COAG) endorses the new rules and they are made in the next few months. In order to make the best use of national and jurisdictional planning inputs and resources, and to minimise re-work, there would be significant benefit for both stakeholders and the businesses in getting clarification as soon as possible that the TAPR publication timeframe for 2020 is by 31 October.

¹ This request is on behalf of Powerlink, TransGrid, TasNetworks and ElectraNet. AEMO is the TNSP in Victoria.

At meetings in August 2019 with the ESB's transmission policy working group, it was agreed that AEMO would provide a near final version of the recent summer data in June for input into the October TAPR. The development of an October TAPR allows such information to be taken into account, aligning with the new actionable ISP framework.

Energy Networks Australia considers that it is sensible to develop and publish only one TAPR publication in 2020 and this be the October publication which can take into account the final 2020 ISP. If the actionable ISP rules were not implemented, the TNSPs would still publish their TAPRs in October 2020 and revert to the June date the following year.

Energy Networks Australia would appreciate a prompt response to this request so that TNSP resources can be diverted onto more appropriate valued work between now and end of June. In order to achieve this Energy Network Australia asks the AER to provide its response prior to the 20 March COAG meeting. If necessary, the AER may also need to advise each TNSP directly of its decision on the no action request.

Should you have any queries on this request please feel free to contact Verity Watson, vwatson@energynetworks.com.au.

Yours sincerely,



Andrew Dillon

Chief Executive Officer