

Our Ref: #19,800,105

4 July 2025

Mr Prajit Parameswar  
**Chief Commercial Officer**  
Marinus Link Pty Ltd  
PO Box 721 Hobart, TAS 7001

Sent by email to: [REDACTED]

Dear Prajit

**Re: Request for concurrent feedback loop and revised Revenue Proposal processes**

I am writing to you regarding your letter of 21 May 2025 where you sought clarification as to the AER's requirements regarding the feedback loop in relation to the revised revenue proposal, which Marinus Link Pty Ltd (MLPL) is expected to submit to the AER by 15 July 2025.

As noted in your letter, the AER's Commencement and Process Paper (CPP) sets the expectation that both the feedback loop assessment and Regulatory Investment Test for Transmission (RIT-T) update occur before MLPL submits the revised revenue proposal.<sup>1</sup> The AER considers both these steps as prudent, particularly given stakeholder submissions in response to our Issues Paper highlighted the importance of updated analysis to provide stakeholders with confidence that Project Marinus remains optimal and will deliver benefits to consumers.

I note Marinus Link expects to provide the AER with the RIT-T update before submitting the revised revenue proposal on 15 July, consistent with the expectation in the CPP.

Your letter notes the feedback loop assessment cannot be completed before July 15 as the assessment will require a re-running of the Integrated System Plan cost benefit analysis. Consequently, MLPL is requesting concurrent feedback loop and revised revenue proposal processes with the feedback loop request to be sent to AEMO before MLPL submits the revised revenue proposal.

The AER is satisfied that the revised timeline as proposed by MLPL, including requesting the feedback loop before submitting the revised proposal, is appropriate. Below I set out the AER's key considerations in reaching this position.

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<sup>1</sup> AER, *Marinus Link – Revised Commencement and Process Paper*, December 2024, p 6.

**Concurrent feedback loop and revenue determination process**

Under the revised approach, the AER considers it acceptable that MLPL will submit a feedback loop request to AEMO before submitting the revised revenue proposal in July. The AER considers it preferable that sufficient time be allowed to complete the cost benefit analysis. The AER expects the outcome of the feedback loop process will be known before the October supplementary draft decision. Should there be any further delay to the process, the AER expects to be made aware of any revised timings by MLPL and will consider implications for the revenue determination milestones set out in the CPP.

**Contingent Project Applications and feedback loop**

While Marinus Link is progressing via a revenue determination under the Intending Transmission Network Service Provider framework, the AER considers the contingent project application process is instructive and relevant to MLPL's circumstances. The proposed approach regarding the feedback loop is consistent with the concurrent assessment of a contingent project application and a feedback loop as permitted by clause 5.16A.5(b) of the National Electricity Rules. Consequently, the AER considers it acceptable that MLPL request the feedback loop prior to submitting the revised revenue proposal in July.

**Commencement and Process Paper**

Amendments to the CPP can be made under clause 6A.9.3(f) of the National Electricity Rules upon application from the proponent where the AER is satisfied that circumstances have arisen such that the amendments are reasonably necessary.

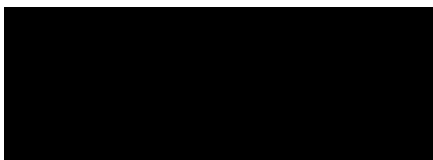
The AER does not consider amendments to the CPP are necessary given completion of the feedback loop before July 15 was set as an expectation, not a requirement, in the CPP. Further, as the outcome of the feedback loop process is expected to be known before the October supplementary draft decision, the AER does not consider it necessary to amend the timing of key milestones set in the CPP.

**Closing**

The AER appreciates the constructive engagement to date regarding the revenue determination process, including the feedback loop and RIT-T update. Should you wish to discuss any of the matters raised in this letter, please feel to contact me at

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Yours sincerely



Dr Kris Funston  
Executive General Manager – Network Regulation