

Final Decision

Lumea's Designated Network Access Policy for Limondale DNA

October 2025

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1 Purpose

On 2 June 2025, Lumea Pty Limited (ACN 626 136 865) as trustee for Lumea Trust (ABN 94 121 353 950) (Lumea) submitted its Designated Network Asset Access Policy for the Limondale DNA to us for approval.

Our Final Decision is to approve Lumea's Limondale DNA access policy. This decision document sets out our assessment leading to the approval of the access policy. A copy of the approved access policy can be found on our [website](#).

1.1 Background

Privately owned and operated extension lines are commonly required to connect generators and large energy customers to the shared transmission network. These extension lines from generation sources and energy customers to the transmission network are broadly described as connection assets.

'Designated network assets' (DNA) are a type of connection asset. The definition of a designated network asset in Chapter 10 of the National Electricity Rules (NER) is as follows:

The apparatus, *plant* and equipment that:

- (a) are used from the *boundary point* to convey, and control the conveyance of, electricity, for an *identified user group*
- (b) are for the exclusive use of the *identified user group* and may be owned by different persons within that *identified user group*
- (c) include power lines that have a route length of:
 - (1) 30 kilometres or more, or
 - (2) less than 30 kilometres where the owner of those assets has entered into a *network operating agreement* in respect of those assets.

The NER creates a third-party access regime designed to protect DNA owners and access seekers to their network. As part of this access regime, the asset owner is required to develop and publish a DNA access policy, based on the negotiating principles for DNAs. The access policy must be approved by the AER.

DNA policies provide essential information to access seekers and we will seek further information from asset owners where we don't consider that a policy meets the minimum NER requirements.

Information requests will have the effect of 'stopping the clock', until the relevant changes to the access policy are made and submitted to us. DNA owners must address the requirements in the NER in order for us to approve their policies.

The DNA owned by Lumea comprises two underground cables connecting the Balranald and Limondale substations, as well as the Limondale substation itself and associated primary and secondary works. The capacity of the DNA is 250MVA and there is currently no spare capacity. The existing facilities connected to the DNA are a solar farm of 220MW, and a BESS with a planned capacity of 50+ MW and 400+ MWh. The DNA's underground cables comprise approximately 1.1 km of 220kV single circuit underground cable and duplicated

72F single mode underground fibre cable for control and protection communications between Balranald substation and the Limondale substation.

2 AER's decision

2.1 Legal framework

Under 5.2A.8(f) of the NER, we must, within 60 business days of receiving a DNA access policy, approve the policy (or a variation of the policy) if we are reasonably satisfied that it complies with the relevant requirements outlined in 5.2A.8 of the NER.

Under Clause 5.2A.8(o) under Schedule 2 of the NER we must publish a [register](#) of DNAs, the identity of DNA owners and a copy of each DNA owner's access policy. This provides a source of information for access seekers on all DNAs.

2.2 AER assessment

On 2 June 2025, Lumea submitted its Designated Network Asset Access Policy Limondale DNA for AER approval.

The AER's role in approving access policies is limited to assessing whether DNA access policies comply with 5.2A.8 of the NER.

We have undertaken a review of Lumea's Limondale DNA Access Policy in accordance with the NER, so that we can be reasonably satisfied that it complies with the requirements of the Rules.

To guide our assessment, we developed an assessment framework based on the requirements of 5.2A.8 of the NER. We then assessed Lumea's proposed access policy against this framework.

In undertaking our assessment we came to the initial view that not all requirements had been fully satisfied. As permitted under the NER, we sought further information from Lumea throughout the assessment process, which resulted in the 'clock being stopped' on the assessment. Lumea subsequently provided all requested information so that we could complete our assessment process.

We highlight this issue for other participants that are intending to submit Designated Network Asset Access Policies in the future. It is important to address all requirements of the Rules in your initial application to allow for efficient consideration. Use our assessment framework in Table 1 as a guide.

Areas of the policy for which we sought further information included clarification as to whether both Lumea and the applicant must adhere to the same timeframes for the provision of decisions and information, in order to facilitate reasonable negotiations for access for both Lumea and the applicant. We also asked Lumea to clarify that applicants had the right to obtain sufficient information to prepare a request for DNA services, as well as to include to include a 'key terms' section that clearly replicates schedule 5.12

Following a request for further information, Lumea amended the policy specify that both Lumea and the applicant must negotiate in good faith and comply with the timeframes set out in the policy. Lumea amended the policy to ensure that the timeframes required for responses from both the applicant and Lumea at various stages of the policy were equivalent (20 business days), with the exception of a timeframe set by Lumea for the provision of other relevant information to supplement an Access Enquiry.

Lumea also amended the policy to include a key terms section replicating 5.12 (Schedule 1 - Definitions) and specified in the Access overview (Item 5) that applicants had the right to obtain sufficient information to prepare a request for DNA services, so that these can be easily identified by potential applicants seeking to understand the process for access. At our request, Lumea also provided a brief description of the route of the asset.

We considered that these changes were sufficient to meet the minimum requirements of the NER.

Table 1 provides an overview of the broad categories against which we assessed Lumea's Limondale DNA Access Policy. Although our assessment was in greater detail, Table 1 provides an overview of the nature of the assessment we undertook.

Table 1: AER assessment of Lumea's Limondale DNA Access Policy

Category and corresponding NER references	Where addressed in Lumea's Riverina DNA access policy
- Information requirements: description of the asset, capacity and other limitations 5.2A.8(b1) (1); 5.2A.8(b1) (2)	Schedule 4, Schedule 2 item 6, Schedule 2 item 7, Schedule 2 item 11
- Consistency with the schedule 5.12 in respect of costs, revenues, contractual rights and obligations 5.2A.8(b1) (3)	Schedule 1
- Information and requirements regarding pricing, cost sharing, timeframes and good faith negotiations 5.2A.8(b1) (4), 5.2A.8 (b3), 5.2A.8 (b4), 5.2A.8(b1) (5), 5.2A.8 (b2)	Items 6, 11, and 12.
- Availability of commercial arbitration. 5.2A.8(b1) (6)	Item 11

2.3 Consultation

Under Clauses 5.2A.8(h) of the NER we may decide to consult on a DNA access policy.

We have decided not to consult on Lumea's Limondale DNA Access Policy because:

- the access seeker had input into the development of Lumea's Limondale DNA access policy
- there currently exists no additional capacity to facilitate other access seekers to connect to the DNA.

However, in future DNA access policy assessments, there may be cases (such as for a 'significant' designated network asset in terms of its length or other features) where we may determine consultation is beneficial.

2.4 Conclusion

In accordance, with clause 5.2A.8(f) of the National Energy Rules, on 2 June 2023 we have decided to approve Lumea's access policy.

As required under the NER, we have included Lumea's Limondale DNA Access Policy in the Register of Dedicated Network Assets and published a copy of the access policy on our [website](#).