Dear respected Sir/Madam,

Re: Submission on Transgrid's 2025–26 Network Support Pass-Through Application

Please find attached the submission from the Centre for Smart Power and Energy Research (CSPER), Deakin University, titled "**Verifying Network Support Capability and Costs in Transgrid's 2025–26 Pass-Through Application.**" It responds to the Australian Energy Regulator's consultation on Transgrid's proposed net pass-through of $9.34 million.

We recommend assessing each of the five claims against the service contracted, the evidence of readiness or delivery, and the costs attributable to the event. This means checking availability and enablement records for Tumut 3, reviewing voltage response records for the Riverina and Darlington Point batteries, and verifying that the Broken Hill battery, load banks and generators can operate together under islanded conditions.

Prepared by Dr Alireza Ganjovi and A/Prof. Saman A. Gorji, the submission draws on our research on decision-useful observability and verified capability, as well as our previous submissions on Basslink system security, Endeavour Energy's Emergency Backstop Mechanism and the AER's capital expenditure models. We recommend that the AER verify the basis for the labour allocation and preparatory expenditure, account for the $22.00 million already recovered through 2025–26 transmission prices, and publish a short, non-confidential reconciliation showing how the individual adjustments combine into the final amount.

Thank you for the opportunity to contribute to the consultation. We welcome the opportunity to discuss our recommendations with the AER.

Yours sincerely,

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