

15 October 2018

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Dear Sebastian,

### **Submission to the Draft Transmission Annual Planning Report (TAPR) Guideline**

AEMO welcomes the opportunity to provide input to the AER's draft TAPR Guideline.

The Annual Planning Reports (APRs) are designed to identify investment opportunities for both network and non-network service providers that will relieve future network limitations. Additionally, the information provided in the APRs will have significant importance in the development of future Integrated System Plans (ISPs) published by AEMO. As such, clear and consistent provision of information from all network service providers (NSPs) in their APRs will be necessary so that the NEM-wide strategic plan is truly optimised and robust.

As the transformation of energy supply and usage continues, the importance of APRs to remain fit-for-purpose to meet stakeholder needs grows. AEMO is therefore of the view that the following guiding principles must be applied to the TAPR framework:

- Transparency of information – AEMO supports greater transparency, provided that the information published is relevant and meets the objectives of the report.
- Flexibility – AEMO believes flexibility rather than over-prescription with the data requested to be published and the form in which it is to be published, is required to ensure the process remains relevant over time.
- Alignment with the longer-term objective of NEM-wide planning processes – in order to maintain the usefulness of the TAPRs, its framework's longer-term objective must be to inform the development and implementation of the ISP and joint planning with Distribution Network Service Providers (DNSPs).

In general, AEMO believes the information required to be published in future TAPRs, as proposed in the AER's Draft Guidelines are consistent with the intent and content of the current Victorian Annual Planning Report (VAPR). While the AER have requested more information on current and emerging constraints on transmission lines, thereby focussing on the impact of increasing demand, AEMO notes that currently in Victoria the majority of emerging potential constraints are expected to be generation driven constraints. Therefore, some information requested through the draft template may not be relevant for these generation driven constraints.

Additionally, as the planner and procurer of transmission services for the declared shared network (DSN) in Victoria, AEMO will only incorporate the proposed information relevant to

the DSN. This is also in relation to information requested for new generation connections<sup>1</sup>. We note the provision of connection point information will remain the responsibility of the various DNSPs in Victoria which forms part of their Systems Limitations Template or Transmission Connection Planning Report.

While the new requirements and clarifications in the Draft Guidelines represent valuable additions, AEMO still seeks clarity from the AER on some of the information to be published so that the objective of the TAPRs is achieved and its full value to stakeholders is delivered. These areas are highlighted below.

- AEMO suggests the categorisation of Sections 4.1.1 and 4.1.2 is changed from “transmission connection points” and “transmission line segment”, to “transmission terminal stations”<sup>2</sup> and “transmission lines between terminal stations” respectively for the following reasons:
  - The AER’s current categorisation on connection points and line segments does not align well with coverage of the DSN assets, for example those in termination stations that are not directly connected to connection points.
  - The level of detail requested by the AER’s categorisation appears to encompass network equipment, such as traps and droppers, which would provide limited additional value to interested stakeholders of the TAPR or to delivering its objective.
- Clarification in Section 4.1.1 that fault level requirements only relates to emerging constraints.
- Clarification in Section 4.1.3 that only non-confidential information on new generation connections are required to be published. Additionally, AEMO would like to caution that the provision of forecast load duration curves for new connections<sup>3</sup> may not be of high accuracy, and therefore of limited additional value due to uncertainty of future operational behaviour with no historical data.

Once the above comments are addressed, AEMO believes the Guidelines will provide the appropriate information and value TAPR stakeholders seek. We look forward to continued consultation with the AER as the Guidelines are finalised.

If you would like to discuss any aspect of our submission in more detail, please contact Reena Kwong (reena.kwong@aemo.com.au).

Yours sincerely,



David Swift

**Executive General Manager, Planning and Forecasting**

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<sup>1</sup> AEMO will only publish new generation connection information for connections that connect directly to the Victorian DSN.

<sup>2</sup> That is, mainly transformers and reactive power plants and busbars.

<sup>3</sup> AEMO will only produce forecast load duration curves for new DSN load connections.