

# Murraylink transmission determination 2018–23

April 2018

Attachment B Pricing Methodology





Pricing methodology

Effective July 2018 to June 2023

May 2014
Murraylink Pricing Methodology.docx



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#### **Amendment Record**

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#### Glossary

#### **Shortened forms**

AARR	Aggregate Annual Revenue Requirement
AER	Australian Energy Regulator
ASRR	Annual Service Revenue Requirement
CRNP	cost reflective network pricing
TNSP	transmission network service provider
TUOS	transmission use of system

#### Terms

# The AER has adopted the following definitions for the purposes of the *guidelines* only:

Appointing provider	has the meaning ascribed to it in clause 6A.29.1(a) of the National Electricity Rules.
Contract agreed maximum demand	means the agreed maximum demand negotiated between a <i>TNSP</i> and a <i>transmission customer</i> .
Current metered energy offtake	means metered <i>energy</i> measured at a <i>connection point</i> in the current <i>billing period</i> .
Current metered maximum demand offtake	means metered maximum demand measured at a <i>connection point</i> in the current <i>billing period</i> .
Directly attributable	in relation to <i>transmission</i> assets refers to assets that are used or required to provide the relevant pricing <i>category of prescribed transmission service</i> .
Guidelines	means the pricing methodology guidelines.
Historical metered energy offtake	means metered <i>energy</i> measured at a <i>connection point</i> in the corresponding <i>billing period</i> two years earlier.
Historical metered maximum demand offtake	means metered maximum demand measured at a connection point in the corresponding billing period two years earlier.
National Electricity Rules	means the Rules as defined in the National Electricity Law.



#### 1 Introduction

Murraylink is a 180 km, HVDC 220 MW transmission link between Red Cliffs in Victoria and Berri in South Australia. It can control power transfers to the limit of its capacity, in either direction, between the Victorian and South Australian transmission networks. The link is dispatched by AEMO, in similar manner to a generator, to control flows between the Victorian and South Australian regions of the National Electricity Market (NEM) and thereby minimise the costs of generation in the NEM. The Murraylink asset is owned by the *Murraylink Transmission Partnership* ABN 79 181 207 909. The Murraylink Partnership are beneficially owned by Energy Infrastructure Investments Pty Limited (EII).

EII is an energy infrastructure investment company, which owns electricity interconnectors (including Murraylin), gas fired power *generation*, coal seam gas processing plants and gas pipelines. EII is owned by:

- Marubeni Corporation (49.9%) a Japanese Company with businesses across a
  wide range of industrial sectors internationally. Marubeni has interests in
  approximately 6,300 MW of *generation* capacity around the world, including
  1,000 MW in Australia, through interests in the Milmerran Power Station in
  Queensland and the Smithfield Cogeneration Plant in New South Wales;
- Osaka Gas (30.2%) has energy investments in over 56,000 km of gas transmission and distribution pipelines in Japan and an interest in approximately 5,200 MW of power generation in Japan, USA and Europe; and
- APA Group (19.9%) APA is a major owner and operator of energy infrastructure in Australia owning over 12,000km of gas transmission pipelines and over 2,500 km of gas distribution networks.

The Murraylink asset is operated and maintained by the APA Group under contractual arrangements.

Clause 6A.25.1(a) of the *National Electricity Rules* requires the *AER* to develop, in accordance with the *transmission consultation procedures*, *guidelines* relating to the preparation of a proposed *pricing methodology* by a *TNSP*.

In this *pricing methodology* the words and phrases presented in *italics* have the meaning given to them in the glossary; or, if not defined in the glossary, the *National Electricity Rules*.

Murraylink's proposed *pricing methodology* has been developed in accordance with the AER's *Electricity Transmission Network Service Providers Pricing Methodology Guidelines* (the *Guidelines*)<sup>1</sup>.

AER, Final - Electricity Transmission Network Service Providers Pricing Methodology Guidelines, October 2007.



## 2 Murraylink's Pricing Methodology

### 2.1 Information requirements

A *TNSP*'s proposed *pricing methodology* must contain the following information:

Requirement	Murraylink Compliance
(a) Whether the <i>TNSP</i> is the sole provider of <i>prescribed transmission services</i> within its <i>region</i> or whether there are multiple <i>TNSP</i> s providing <i>prescribed transmission services</i> .	Murraylink is not the sole provider of transmission services in either Victoria or South Australia. SP AusNet and ElectraNet are the other TNSPs in those respective jurisdictions
(b) If there are multiple <i>TNSP</i> s providing <i>prescribed</i> transmission services within its region the <i>TNSP</i> should detail whether it:	Murraylink provides prescribed transmission services in two regions of the NEM
(1) has been appointed as the <i>Co-ordinating Network</i> Service Provider for a region under clause 6A.29.1(a) of the National Electricity Rules and is therefore	f Coordinating Network Service Provider i either Victoria or South Australia.
responsible for the allocation of the AARR within the region; or	The Co-ordinating Network Service Providers for Murraylink's prescribed transmission services are:
	For Victoria, AEMO has been appointed as the Co-ordinating Network Service Provider
	For South Australia, ElectraNet has been appointed as the Co-ordinating Network Service Provider.



Requirement	Murraylink Compliance
(2) is an appointing provider for the purposes of clause 6A.29.1(a) of the National Electricity Rules and if so, it should nominate the Coordinating Network Service Provider and identify the parts of its proposed pricing methodology which will be dealt with by the Coordinating Network Service Provider.	<ul> <li>Murraylink is an appointing provider for the purpose of the Rules.</li> <li>Certain parts of this proposed pricing methodology will be dealt with by the Coordinating Network Service</li> <li>Providers, as follows: <ul> <li>The calculation of the ASRR for the Victorian and South Australian regions, in accordance with clause 6A.22.2 of the Rules; and</li> <li>The calculation of attributable cost shares, in accordance with clause 6A.22.3 of the Rules.</li> <li>The principles for the allocation of the AARR to categories of prescribed transmission services, in accordance with clause 6A.23.2 of the Rules.</li> <li>The principles for the allocation of the ASRR to transmission network connection points, in accordance with clause 6A.23.3 of the Rules.</li> <li>Pricing structure principles, in accordance with clause 6A.23.4 of the Rules.</li> </ul> </li> </ul>
(c) Details of how the AARR has been derived including an explanation of how the operating and maintenance costs subtracted from the maximum allowed revenue in accordance with clause 6A.22.1 of the National Electricity Rules have been determined and how they will be recovered via transmission prices.	Murraylink's AARR is for prescribed transmission services only. There is no common service component to the Murraylink AARR, for the purpose of clause 6A.22.1 of the Rules.  Murraylink's AARR is determined by the AER and is adjusted annually using the regulatory control formula for CPI, X and other factors.  Murraylink's AARR is recovered through transmission prices as follows:  55% from AEMO; and  45% from ElectraNet.
(d) Details of how the AARR will be allocated to derive the ASRR for each category of prescribed transmission service, including:	Murraylink's AARR is for prescribed transmission services only. It is included in the ASRR for the Victorian and South Australian transmission region as described in response to clause (c).



Requirement	Murraylink Compliance
(1) how the attributable cost shares for each category of prescribed transmission service will be calculated in accordance with clause 6A.22.3 of the National Electricity Rules including:	The calculation of <i>attributable cost shares</i> in accordance with clause 6A.22.3 of the National Rules is described in the <i>pricing methodologies</i> of AEMO, for the Victorian region, and Electranet, for the South Australian region.
A. an explanation of how the costs referred to in clause 6A.22.3(a) of the <i>National Electricity Rules</i> will be calculated; and	Included in the AEMO and Electranet pricing methodologies.
B. hypothetical worked examples for each category of prescribed transmission service;	Included in the AEMO and Electranet pricing methodologies.
(2) how the priority ordering approach outlined in clause 6A.18.2(d) of the <i>National Electricity Rules</i> will be applied, including a hypothetical worked example; and	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(3) how asset costs which may be attributable to both prescribed <i>entry services</i> and <i>prescribed exit services</i> will be allocated.	Murraylink does not provide <i>prescribed entry</i> services or <i>prescribed exit services</i> .
(e) Details of how the <i>ASRR</i> for each <i>category of prescribed transmission service</i> will be allocated to each <i>transmission connection point</i> , including:	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(1) how the attributable connection point cost share for both prescribed entry services and prescribed exit services will be calculated in accordance with clause 6A.22.4 of the National Electricity Rules, including:	Included in the AEMO and Electranet <i>pricing</i> methodologies.
A. an explanation of how the costs referred to in clause 6A.22.4(a) of the <i>National Electricity Rules</i> will be calculated;	Included in the AEMO and Electranet pricing methodologies.
B. hypothetical worked examples; and	Included in the AEMO and Electranet pricing methodologies.
C. how asset costs allocated to prescribed entry services and prescribed exit services at a connection point, which may be attributable to multiple transmission network users, will be allocated;	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(2) how the locational and pre-adjusted non-locational shares of <i>prescribed TUOS services</i> will be allocated in accordance with 6A.18.3(d)of the <i>National Electricity Rules</i> ;	Included in the AEMO and Electranet <i>pricing</i> methodologies.



Requirement	Murraylink Compliance
(3) how the locational and adjusted non-locational components of prescribed TUOS services will be determined and allocated to connection points in accordance with clause 6A.18.3(c) of the National Electricity Rules.	Included in the AEMO and Electranet <i>pricing</i> methodologies
(f) In relation to price structures:	Included in the AEMO and Electranet <i>pricing</i> methodologies
(1) confirm that separate prices will be developed for each category of prescribed transmission service;	See above.
(2) confirm that the prices for <i>prescribed entry services</i> and prescribed <i>exit services</i> will be a fixed annual amount, and describe how these amounts will be calculated;	See above.
(3) outline how the pricing structure for the recovery of the locational component of prescribed TUOS services complies with these guidelines and clauses 6A.18.4(e)-(i) of the National Electricity Rules including outlining:	See above.
A. the time period for the allocation of <i>generation</i> to <i>load</i> as prescribed in clause S6A.3.2(3) of the <i>National Electricity Rules</i> ;	See above.
B. how prices will be structured to comply with the National Electricity Rules and these guidelines; and	See above.
C. the process for deriving the locational charge for each billing period and details of any adjustment mechanism applied to a measure of forecast demand once actual demand is known;	See above.
(4) outline how the postage stamp pricing structure for the recovery of the adjusted non locational component of prescribed TUOS services complies with these guidelines and clause 6A.18.4(j) of the National Electricity Rules; and	See above.
(5) outline how the postage stamp pricing structure for the recovery of prescribed common transmission services complies with these guidelines and clause 6A.18.4(d) of the National Electricity Rules.	See above.
(g) Details of how the <i>TNSP</i> intends to set the <i>prescribed TUOS</i> service locational price at new connection points or at connection points where the load has changed significantly after prescribed <i>TUOS</i> service locational prices have been determined and published by the <i>TNSP</i> .	Included in the AEMO and Electranet pricing methodologies



Requirement	Murraylink Compliance
(h) If a <i>TNSP</i> expects to calculate a postage stamped charge in accordance with either section 2.3(c)(4)(C) or 2.3(d)(3)(C) of these <i>guidelines</i> , it must explain the likely circumstances surrounding the use of <i>current energy offtake</i> or <i>current maximum demand offtake</i> in its proposed <i>pricing methodology</i> .	Included in the AEMO and Electranet pricing methodologies.
(i) A statement of how the <i>pricing methodology</i> gives effect to and is consistent with, the <i>pricing principles for prescribed transmission services</i> including an explanation of how any alternative pricing structure which the <i>TNSP</i> wishes to apply meets the requirements of clause 6A.18.4(a)-(j) of the <i>National Electricity Rules</i> .	Included in the AEMO and Electranet pricing methodologies.
(j) Details of any proposed transitional arrangements the <i>TNSP</i> considers necessary as a result of the implementation of its <i>pricing methodology</i> .	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(k) Information relating to any prudent discounts for <i>prescribed</i> transmission services previously submitted to the AER or expected to be submitted to the AER within the next regulatory control period and how those discounts are proposed to be recovered from Transmission Network Users in accordance with rule 6A.26 of the National Electricity Rules.	Included in the AEMO and Electranet pricing methodologies.
(I) Details of billing arrangements with <i>Transmission Network Users</i> and transfers between <i>TNSP</i> s conducted in accordance with rule 6A.27 of the <i>National Electricity Rules</i> .	Murraylink bills AEMO and ElectraNet on a monthly basis, in accordance with clause 6A.27 of the <i>Rules</i> .
(m) Details of the nature of <i>prudential requirements</i> as outlined in rule 6A.28 of the <i>National Electricity Rules</i> and how any capital contributions will be taken into account in determining a <i>Transmission Network Users</i> ' prices for <i>prescribed transmission services</i> .	Included in the AEMO and Electranet <i>pricing</i> methodologies. There are no prudential requirements or capital contributions in respect of Murraylink.
(n) If a <i>TNSP</i> has, in accordance with section 2.5 of these <i>guidelines</i> , provided the <i>AER</i> with a confidential version of its proposed <i>pricing methodology</i> , the non confidential version of the proposed <i>pricing methodology</i> must outline the area or areas where the <i>TNSP</i> is making a claim for confidentiality and why.	Murraylink is not claiming confidentiality in respect of this proposed <i>pricing methodology</i> .
(o) Details of any derogation in accordance with chapter 9 of the <i>National Electricity Rules</i> .	There is no derogation in accordance with chapter 9 of the <i>National Electricity Rules</i> that applies to Murraylink.
(p) Details of any transitional arrangements which apply in accordance with chapter 11 of the <i>National Electricity Rules</i> .	There are no transitional arrangements in accordance with chapter 11 of the <i>National Electricity Rules</i> that apply to Murraylink.



Re	quirement	Murraylink Compliance
(q)	The period over which the proposed <i>pricing methodology</i> will apply.	This proposed <i>pricing methodology</i> will apply for the proposed <i>regulatory control period</i> from 1 July 2018 to 30 June 2023.
(r)	A description of any differences between the <i>pricing</i> methodology applied during the current regulatory control period and that proposed for the next regulatory control period.	There are no differences between the <i>pricing</i> methodology for the current regulatory control period and that proposed for the next regulatory control period.
(s)	Details of how the <i>TNSP</i> intends to monitor, and develop records of its compliance with its approved <i>pricing methodology</i> , the <i>pricing principles for prescribed transmission services</i> and more broadly part J of the <i>National Electricity Rules</i> .	Murraylink will continue to maintain records of payments made by AEMO and ElectraNet for prescribed transmission services and reconcile these payments with the AARR. These details will continue to be included in the regulatory accounts submitted annually to the AER.

# 2.2 Permitted (locational) pricing structures

Requirement	Murraylink Compliance
(a) Prices for the recovery of the locational component of prescribed TUOS services must be based on demand at times of greatest utilisation of the transmission network and for which network investment is most likely to be contemplated in accordance with clause 6A.18.4(e) of the National Electricity Rules.	Included in the AEMO and Electranet pricing methodologies.
(b) The <i>CRNP</i> methodology and modified <i>CRNP</i> methodology outlined in S6A.3 of the <i>National Electricity Rules</i> provides guidance on the process for cost allocation for the locational component of <i>prescribed TUOS services</i> and results in a lump sum dollar amount to be recovered at each <i>transmission connection point</i> .	Included in the AEMO and Electranet pricing methodologies.
(c) The following measures of demand may be applied to the lump sum dollar amount referred to in section 2.2(b) of these guidelines to derive the locational price at each transmission connection point:	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(1) The current contract agreed maximum demand (prevailing at the time transmission prices are published) as negotiated in a transmission customer's connection agreement or the transmission customer's maximum demand in the previous 12 months if the transmission customer has exceeded its current contract agreed maximum demand, expressed as \$/MW/day; or	See above.



Requirement	Murraylink Compliance
(2) The average of the <i>transmission customer's</i> half-hourly maximum demand recorded at a <i>connection point</i> on the 10 weekdays when system demand was highest between the hours of 11:00 and 19:00 in the local time zone during the previous 12 months, expressed as \$/MW/day.	See above.
(d) A TNSP (or Co-ordinating Network Service Provider) may propose alternative pricing structures for the recovery of the locational component of prescribed TUOS services which it considers give effect to, and are consistent with the pricing principles for prescribed transmission services in the National Electricity Rules.	Murraylink is not proposing alternative pricing structures for the recovery of the locational TUoS component.  Included in the AEMO and Electranet pricing methodologies
(e) If a TNSP (or Co-ordinating Network Service Provider) proposes an alternative pricing structure for the recovery of the locational component of prescribed TUOS services it must clearly demonstrate to the AER that the alternative pricing structure:	Muraylink is not proposing alternative pricing structures for the recovery of the locational TUoS component.  Included in the AEMO and Electranet pricing methodologies
(1) gives effect to, and is consistent with the <i>pricing</i> principles for prescribed transmission services in the National Electricity Rules;	See above.
(2) improves on the permitted pricing structures outlined in section 2.2(c) of these <i>guidelines</i> ; and	See above.
(3) contributes to the NEM objective.	See above.
(f) If historical data is unavailable for a <i>connection point</i> for use in either the allocation of costs to a <i>connection point</i> using the <i>CRNP</i> or modified CRNP methodology outlined in S6A.3 or the calculation of locational prices outlined in section 2.2(c) of these <i>guidelines</i> , an estimate of demand must be used instead.	Included in the AEMO and Electranet pricing methodologies
(g) The contract agreed maximum demand must only be used for the calculation of the locational component of prescribed TUOS services pricing structure if the transmission customer's connection agreement or other enforceable instrument governing the terms of connection of the transmission customer.	Included in the AEMO and Electranet pricing methodologies.
(1) nominates a fixed maximum demand for the <i>connection</i> point; and	See above.
(2) specifies penalties for exceeding the <i>contract agreed</i> maximum <i>demand</i> .	See above.



Requirement	Murraylink Compliance
(h) The locational TUOS price calculated in accordance with these <i>guidelines</i> must be applied to a measure of actual, forecast or contract demand to derive the locational charge.	Included in the AEMO and Electranet <i>pricing</i> methodologies.

## 2.3 Permitted (postage stamp) pricing structures

Requirement	Murraylink Compliance
(a) Prices for <i>prescribed common transmission services</i> and the recovery of the adjusted non-locational component of <i>prescribed TUOS services</i> are to be set on a <i>postage stamp basis</i> in accordance with clause 6A.18.4(d) and clause 6A.18.4(j) of the <i>National Electricity Rules</i> respectively.	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(b) Permissible postage stamp pricing structures for either the non-locational component of <i>prescribed TUOS services</i> or <i>prescribed</i> common <i>transmission services</i> must be based on any one of the following:	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(1) either contract agreed maximum demand or historical energy;	See above.
(2) maximum demand; or	See above.
(3) an alternative pricing structure proposed by the TNSP.	See above.
(c) If a postage stamped structure is based on either <i>contract</i> agreed maximum demand or historical energy it must be calculated as follows:	Included in the AEMO and Electranet <i>pricing</i> methodologies.
(1) Each financial year a TNSP (or Co-ordinating Network Service Provider) must determine the following two prices:	See above.
A. an energy based price that is a price per unit of historical metered energy or current metered energy at a connection point; and	See above.
B. a contract agreed maximum demand price that is a price per unit of contract agreed maximum demand at a connection point.	See above.



Requirement	Murraylink Compliance
(2) Either the energy based price or the contract agreed maximum demand price applies at a connection point except for those connection points where a transmission customer has negotiated reduced charges for prescribed common transmission services or the adjusted non-locational component of prescribed TUOS services in accordance with clause 6A.26.1 of the National Electricity Rules.	See above.
(3) The energy based price and the contract agreed maximum demand price referred to in section 2.3(c)(1) of these guidelines must be determined so that:	See above.
A. a transmission customer with a load factor in relation to its connection point equal to the median load factor for connection points with transmission customers connected to the transmission network in the region or regions is indifferent between the use of the energy based price and the contract agreed maximum demand price; and	See above.
B. the total amount to be recovered by <i>prescribed</i> common transmission services or the adjusted non-locational component of prescribed TUOS services does not exceed the ASRR for each category of prescribed transmission service.	See above.
(4) The charge for either the prescribed common transmission service or the adjusted non locational component of prescribed TUOS services using the energy based price for a billing period in a financial year for each connection point must be calculated by:	See above.
A. multiplying the <i>energy based price</i> by the metered energy offtake at that <i>connection point</i> in the corresponding <i>billing period</i> two years earlier (i.e. <i>historical metered energy offtake</i> ); or	See above.
B. multiplying the <i>energy based price</i> by the metered energy offtake at that <i>connection point</i> in the same billing period (current metered energy offtake) if the historical metered energy offtake is not available; or	See above.
C. multiplying the energy based price by the current metered energy offtake if the historical metered energy offtake is significantly different to the current metered energy offtake.	See above.



Requirement	Murraylink Compliance
(5) The charge calculated for prescribed common transmission services or the adjusted non-locational component of prescribed TUOS services using the contract agreed maximum demand price for a billing period in a financial year for each connection point must be calculated by multiplying the contract agreed maximum demand price by the maximum demand for the connection point in that financial year and then dividing this amount by the number of billing periods in the financial year.	See above.
(6) The energy based price or the contract agreed maximum demand price that applies for prescribed common transmission services or the adjusted non-locational component of prescribed TUOS services must be the one which results in the lower estimated charge for that prescribed transmission service.	See above.
(7) A contract agreed maximum demand price must only be used for the calculation of the prescribed common transmission services charge or the adjusted non-locational component of prescribed TUOS services charge if the transmission customer's connection agreement or other enforceable instrument governing the terms of connection of the transmission customer:	See above.
A. nominates a contract agreed maximum demand for the connection point; and	See above.
B. specifies penalties for exceeding the <i>contract agreed</i> maximum demand.	See above.
(d) If a postage stamped pricing structure is based on maximum demand it must be calculated as follows:	Murraylink does not determine <i>postage</i> stamp based prices.  This detail is included in the AEMO and Electranet <i>pricing methodologies</i> .
(1) Each financial year a TNSP (or Co-ordinating Network Service Provider) must determine the maximum demand based price that is a price per unit of historical metered maximum demand or actual metered maximum demand measured at a connection point;	See above.
(2) The maximum demand based price applies at a connection point except for those connection points where a transmission customer has negotiated reduced charges for prescribed common transmission services or the adjusted non-locational component of prescribed TUOS services in accordance with clause 6A.26.1 of the National Electricity Rules.	See above.

Requirement	Murraylink Compliance
(3) The charge for either the <i>prescribed common transmission services</i> or the adjusted non-locational component of <i>prescribed TUOS services</i> using the <i>maximum demand</i> based price for a <i>billing period</i> in a <i>financial year</i> for each <i>connection point</i> must be calculated by:	See above.
A. multiplying the <i>maximum demand</i> based price by the <i>maximum demand</i> at that <i>connection point</i> in the corresponding <i>billing period</i> two years earlier (i.e. <i>historical metered maximum demand offtake</i> ); or	See above.
B. multiplying the <i>maximum demand</i> based price by the maximum demand at that <i>connection point</i> in the same <i>billing period</i> ( <i>current metered maximum demand offtake</i> ) if the <i>historical maximum demand offtake</i> is not available;	See above.
C. multiplying the maximum demand based price by the current metered maximum demand offtake if the historical metered maximum demand offtake is significantly different to the current metered maximum demand offtake.	See above.
(e) A TNSP (or Co-ordinating Network Service Provider) may propose alternative postage stamp pricing structures which it considers give effect to, and are consistent with the pricing principles for prescribed transmission services in the National Electricity Rules, in which case it must clearly demonstrate to the AER that the alternative pricing structure is least distortionary to transmission network users' behaviour and:	Murraylink does not determine <i>postage</i> stamp based prices.  Included in the AEMO and Electranet pricing methodologies.
(1) gives effect to, and is consistent with the <i>pricing</i> principles for prescribed transmission services in the National Electricity Rules;	See above.
(2) improves on the permitted pricing structures outlined in section 2.2(c) and (d) of these <i>guidelines</i> ; and	See above.
(3) contributes to the NEM objective.	See above.

# 2.4 Attribution of transmission system assets to categories of prescribed transmission services

Requirement	Murraylink Compliance
(a) The following sections outline the types of <i>transmission</i> system assets that are <i>directly attributable</i> to each <i>category</i> of prescribed transmission service.	Murraylink's transmission system assets are all directly attributable to prescribed transmission services.



Requirement	Murraylink Compliance
(1) The types of <i>transmission system</i> assets that are <i>directly attributable</i> to <i>prescribed entry services</i> are limited to:	Murraylink has no <i>transmission system</i> assets that are <i>directly attributable</i> to <i>prescribed entry services</i> .
<ul> <li>A. substation buildings, substation land and associated infrastructure (such as fences, earthing equipment etc);</li> </ul>	See above.
B. switchgear and <i>plant</i> associated with <i>generators'</i> generating systems connection and <i>generator</i> transformers;	See above.
C. secondary systems associated with primary systems providing <i>prescribed entry services</i> ;	See above.
D. transmission lines owned by TNSPs connecting generators' generating systems to the TNSP's transmission network; and	See above.
E. meters associated with prescribed entry services and owned by the TNSP.	See above.
(2) The types of <i>transmission system</i> assets that are <i>directly attributable</i> to <i>prescribed exit services</i> are limited to:	Murraylink has no <i>transmission</i> system assets that are allocated to <i>prescribed exit</i> services.
<ul> <li>A. substation buildings, substation land and associated infrastructure (such as fences, earthing equipment etc);</li> </ul>	See above.
B. switchgear used to supply the sub-transmission voltage and associated switchgear at both the transmission and sub-transmission voltage level;	See above.
C. transformers which supply the sub-transmission voltage level and associated switchgear at both the transmission and sub-transmission voltage level;	See above.
D. secondary systems associated with primary systems providing <i>prescribed exit services</i> ;	See above.
E. meters associated with prescribed exit services and owned by the TNSP; and	See above.
F. reactive plant installed for power factor correction which provides benefit to transmission customers connected at the connection point.	See above.
(3) The types of <i>transmission system</i> assets that are <i>directly attributable</i> to <i>prescribed TUOS services</i> are limited to:	Murraylink transmission system assets are all directly attributable to prescribed TUoS services.



Requirement	Murraylink Compliance
A. substation buildings, substation land and associated infrastructure (such as fences, earthing equipment etc);	Murraylink transmission system assets include electronic switchgear that controls the DC transmission cable and transformers. This equipment and the associated bus work, control and protection systems is located at Red Cliffs and Berri.
B. transmission lines and associated easements;	Murraylink <i>transmission system</i> assets include a DC transmission cable between Red Cliffs and Berri.
C. switchgear on transmission lines and auto- transformers which are part of the transmission network and are switched at the substation including associated bus work and control and protection schemes;	Murraylink transmission system assets include electronic switchgear that controls the DC transmission cable and transformers. This equipment and the associated bus work, control and protection systems is located at Red Cliffs and Berri.
D. auto-transformers which transform <i>voltage</i> between <i>transmission</i> levels;	Murraylink <i>transmission system</i> assets includes specially designed transformers that permit the conversion of AC to DC.
E. static and dynamic <i>reactive plant</i> and associated switchgear and transformation regardless of the <i>voltage</i> level; and	Murraylink transmission system assets include static and dynamic reactive plant and associated electronic switchgear located at Red Cliffs and Berri.
F. all system controls required for monitoring and control of the integrated <i>transmission system</i> including remote monitoring and associated communications, <i>load shedding</i> and special control schemes and <i>voltage</i> regulating <i>plant</i> required for operation of the integrated <i>transmission system</i> .	Murraylink transmission system assets include system controls required for monitoring and control of the integrated transmission system including remote monitoring and associated communications, load shedding and special control schemes and voltage regulating plant required for operation of the integrated transmission system at Red Cliffs and Berri
(4) The types of <i>transmission system</i> assets that are <i>directly</i> attributable to prescribed common transmission services are limited to:	Murraylink has no transmission system assets that are directly attributable to prescribed common transmission services.
A. substation buildings, substation land and associated infrastructure (such as fences, earthing equipment etc);	See above.
B. <i>power system</i> communications networks;	See above.
C. control systems;	See above.
D. network switching centres (excluding generation and system control functions);	See above.

Requirement	Murraylink Compliance
E. static and dynamic reactive control <i>plant</i> and associated switchgear;	See above.
F. spare <i>plant</i> and equipment including that installed at <i>substations</i> ;	See above.
G. fixed assets such as buildings and land that are not associated with <i>substation</i> or line easements, (head office buildings, land for future <i>substation</i> s etc.); and	See above.
H. motor vehicles and construction equipment.	See above.
(b) In its proposed <i>pricing methodology</i> , a <i>TNSP</i> may include additional types of <i>transmission system</i> assets that it considers are <i>directly attributable</i> to one or more <i>category of prescribed transmission service</i> .	Murraylink does not seek to include additional types of transmission system assets to any category of prescribed transmission services.
(c) A <i>TNSP</i> must justify the inclusion of any additional types of <i>transmission system</i> assets referred to in section 2.4(b) of these <i>guidelines</i> and the <i>AER</i> will consider each when assessing the <i>TNSP's</i> proposed <i>pricing methodology</i> .	Murraylink does not seek to include additional types of transmission system assets to any category of prescribed transmission services.

#### 2.5 Disclosure of information

Requirement	Murraylink Compliance
(a) A <i>TNSP</i> should develop its proposed <i>pricing methodology</i> so that it can be publicly released by the <i>AER</i> .	Murraylink has developed this proposed pricing methodology so that it can be publicly released by the AER.
(b) If a <i>TNSP</i> identifies information which it considers to be confidential or commercially sensitive and it considers that providing that information to the <i>AER</i> is necessary in order to demonstrate that its proposed <i>pricing methodology</i> complies with the <i>National Electricity Rules</i> , it should include that information in a confidential version of its proposed <i>pricing methodology</i> and provide it to the <i>AER</i> .	Murraylink has not identified any confidential or commercially sensitive information in this proposed pricing methodology.
(c) The AER will not publicly disclose a confidential version of a proposed <i>pricing methodology</i> .	Noted.
(d) The AER considers that confidential or commercially sensitive information is likely to include details of, or information that could readily be used to infer an individual transmission customer's price or charge, premises, negotiated discounts, prudential requirements or other commercial arrangements relating to its electricity supply.	The information contained in Murraylink pricing proposal is not likely to include details of, or information that could readily be used to infer an individual <i>transmission customer's</i> price or charge, premises, negotiated discounts, <i>prudential requirements</i> or other commercial arrangements relating to its electricity supply.



Requirement	Murraylink Compliance
(e) If a <i>TNSP</i> considers that other information should not be made publicly available, it must justify its claim for confidentiality to the <i>AER</i> .	Murraylink is not claiming confidentiality for this proposed <i>pricing proposal</i> .
(f) If the AER disagrees with a TNSP's claim that information provided to it is of a confidential or commercially sensitive nature, the AER will:	See above.
(1) notify the <i>TNSP</i> of its view, and	See above.
(2) allow the TNSP to withdraw the information or rescind its claim for confidentiality.	See above.
(g) If information is withdrawn under 2.5(f) of these guidelines the AER will:	See above.
(1) not take the information into consideration when assessing the TNSP's proposed <i>pricing methodology</i> , and	See above.
(2) not publicly disclose that information.	See above.