



Dr Kris Funston
Executive General Manager, Networks Regulation
Australian Energy Regulator

Sent by email to: networksinformation@aer.gov.au

Dear Dr Funston

AER Network Information Requirements Review

Thank you for the opportunity to comment on the AER's Network Information Requirements Review.

APA supports the AER's review to improve and streamline information requirements and collection processes for electricity networks and transmission. We trust that the review will deliver better quality information and more efficient and less onerous information requirements.

As you know, APA manages and maintains Directlink and Murraylink for Energy Infrastructure Investments (EII). We understand the information requirements for interconnectors will be captured by the review.

The current Regulatory Information Notices for Directlink and Murraylink are more streamlined compared to RINs for transmission network service providers (TNSPs). Streamlined information requirements for interconnectors is appropriate as the operation of interconnectors are simpler than TNSPs'. Specifically, interconnector revenue collection is simpler, there are fewer capital expenditure projects, demand does not have a material impact on operations or capital expenditure, and interconnectors have no augmentation or connection work.

We have compared the information requirements for Transgrid and Murraylink (both cover the reset for FY21 to FY25). Below is a list of the worksheets that are required in one of the RIN Workbooks not required in the other.

Worksheets not included in Murraylink RIN:

- 2.2 Repex
- 2.3 Augex (a)
- 2.3 Augex (b)
- 2.5 Connections
- 2.10 Overheads (split)
- 3.1 Revenue
- 3.2 Operating Expenditure (opex categories and cost allocations)
- 3.3 Assets (RAB)
- 3.4 Operational Data
- 3.5 Physical Assets
- 3.7 Operating environment
- 5.4 Maximum Demand and Utilisation.

Worksheets not included in Transgrid RIN:

- 2.3c Material Projects.

APA strongly supports the information requirements for interconnectors to remain more streamlined than for other TNSPs. To ensure that the requirements applying to interconnectors are not unduly onerous, we request that the AER consider either:

- a separate Regulatory Information Order for interconnectors, or
- include provisions in the transmission RIO to allow interconnectors to be excluded from providing certain information.

APA is a member of Energy Networks Australia and our position on AER's review is aligned with ENA's submission.

Please follow up with me if you wish to discuss any matter raised in this submission.

Sincerely,

A solid black rectangular box redacting the signature of Peter Bolding.

Peter Bolding
General Manager Regulatory & Policy
06 May 2022