

AER SUBMISSION JANUARY 2020 SAPN REVISED REGULATORY PROPOSAL 2020-2025

TEC is funded by ECA to work on the equitable decarbonisation of the NEM.

TEC is a member of SAPN's DER integration working group, and has been intimately involved with the development of the LV management strategy and business case over the last two years. As such, we

- Reiterate our support for their strategic LV management program, and commend the AER for supporting this part of the proposal in the Draft Determination, and for taking into account stakeholder submissions such as ours in its evaluation.
- Suggest that the AER should approve the revised and much lower-cost (from \$18 million down to \$5.1 million) — proposal for LV transformer monitoring, as a sensible investment in permanent LV monitoring to replace the obsolete and inefficient practice of using temporary loggers for LV network planning.
- Support a modest increase in expenditure for BAU quality of supply works, commensurate with the observed increase in voltage issues due to solar PV, to ensure that SAPN can maintain current levels of service for customers in coming years, while it works to implement longer-term solutions.

Please contact Mark Byrne, TEC's Energy market advocate, for more information.

Yours sincerely



Director