TransGrid

Reinforcing the NSW Southern Shared Network to increase transfer capacity to demand centres (HumeLink)

Project Assessment Conclusions Report
[29 July 2021]

This piece is painted by indigenous artist Luke Penrith. Luke is a Wiradjuri man who lives in Tumut and has been a key contact working with both the Tumut Elders and Land Councils.

Executive summary

Gugaa – *the Wiradjuri totem is the Gugaa (goanna). Totems are animals that are significant to a family, region, community or individual person as a spirit guide that looks after them.*

TransGrid has investigated options for reinforcing the New South Wales (NSW) Southern Shared Network to increase transfer capacity to the state's major load centres of Sydney, Newcastle and Wollongong.

The driver for reinforcing the Southern Shared Network is to deliver a net economic benefit to consumers and producers of electricity and support energy market transition through:

- increasing the transfer capacity between southern NSW and major load centres of Sydney, Newcastle and Wollongong;
- enabling greater access to lower cost generation to meet demand in these major load centres;
- facilitating the development of renewable generation in high quality renewable resource areas in southern NSW as well as the southern states, which will further lower the overall investment and dispatch costs in meeting NSW demand whilst also ensuring that emissions targets are met at the lowest overall cost to consumers; and
- increasing the competitiveness of bidding in the wholesale electricity market.

In January 2020, we released a Project Assessment Draft Report (PADR) as part of the Regulatory Investment Test for Transmission (RIT-T) to progress the assessment of investments that increase transfer capacity of the shared transmission network between southern New South Wales and the major load centres within the state. The PADR followed the Project Specification Consultation Report (PSCR) released in June 2019. This Project Assessment Conclusions Report (PACR) represents the final stage in the RIT-T consultative process.

OVERVIEW

This PACR finds that Option 3C, comprised of new 500 kV lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby, provides the greatest net benefit of all options considered, across all four scenarios investigated.

Option 3C is therefore the preferred option identified under this RIT-T and is found to have approximately 23 per cent greater estimated net benefits than the second ranked option (Option 2C), on a weighted basis across the four scenarios investigated.

The analysis shows that the preferred option is expected to:

- deliver net benefits of approximately $491 million over the assessment period, in present value terms, which increases further if alternate scenario weightings are assumed, in-line with recent commentary by the Australian Energy Market Operator (AEMO) and the Energy Security Board (ESB);
- reduce the need for new dispatchable generation investment to meet demand going forward;
- avoid capital costs that would otherwise be required associated with enabling greater integration of renewables in the National Electricity Market (NEM);
- lower the aggregate generator fuel costs required to meet demand in the NEM going forward; and
- provide significant 'competition benefits' by increasing the efficiency of bidding in the wholesale market.

The preferred option identified over the course of this RIT-T is consistent with the network topology and operating capacity of HumeLink in the final AEMO 2020 Integrated System Plan (ISP).

All lines are to be constructed in a double-circuit configuration to minimise the overall costs to consumers. This reflects a change since the PADR and represents a refinement of the ISP candidate option, which reduces the investment cost. This has been enabled through undertaking a detailed assessment of the risks involved with adopting double-circuit lines for the specific options considered, compared to single-circuit, and how these can be mitigated to an acceptable level.

Executive summary (continued)

THIS RIT-T HAS EXAMINED REINFORCING THE SOUTHERN SHARED NETWORK TO INCREASE TRANSFER CAPACITY TO KEY DEMAND CENTRES IN NEW SOUTH WALES

TransGrid operates and maintains the transmission network in NSW. The shared transmission network between the Snowy Mountains and Bannaby carries power from all generation across southern NSW to the major load centres of Sydney, Newcastle and Wollongong. It also carries all electricity that is imported from Victoria to the major load centres in NSW. The main transmission lines in this area are heavily congested at times of high demand and will become more congested as new generation connects in southern NSW.

In NSW, where the existing coal-fired generators are retiring progressively from 2022, there is a pressing need for new sources of supply to meet the community's growing energy demand.

There are currently substantial new renewable generation developments anticipated in southern NSW, with projects in construction or under development currently totalling 1,900 MW. In addition, Snowy 2.0 will provide a new source of generation to meet future demand in the major load centres of NSW and to 'firm' supply from the new renewable generation.

However, reinforcement of the Southern Shared Network will be required to allow the transfer of energy to demand centres. Existing congestion at times of high demand limits access to the existing generation capacity of the Snowy Mountains Scheme at times of peak demand. Access to the additional 1,900 MW of new renewable generation and 2,000 MW capacity of Snowy 2.0 in southern NSW would be severely limited, without reinforcement to the Southern Shared Network.[1]

BENEFITS FROM REINFORCING THE SOUTHERN SHARED NETWORK COMPARED TO THE STATUS QUO

The RIT-T must demonstrate that there is an overall net market benefit to the NEM from increasing the transfer capacity of the transmission network – the Southern Shared Network between southern NSW and the major demand centres of Sydney, Newcastle and Wollongong.

The analysis in this PACR shows that the investments considered in this RIT-T are expected to:

- open up additional capacity for new generation (primarily renewable generation) in areas of southern NSW, which have recognised high-quality wind and solar resources;
- increase the transfer capacity between Victoria and NSW, which would provide NSW with access to additional generation from Victoria;
- allow the additional transfer capacity between South Australia and NSW provided by EnergyConnect and the additional transfer capacity between Victoria and NSW provided by the VNI Minor upgrade to flow to major demand centres; and
- increase the competitiveness of bidding in the wholesale market by relieving existing transmission constraints.

In the absence of investment under this RIT-T, alternative investment by market participants in peaking plant and other generation technologies in NSW would be required to continue to meet the State's demand, system stability and security requirements, as existing dispatchable generation in NSW retires.

Increasing access to generation capacity in southern NSW therefore has the potential to benefit the market and consumers through lowering the overall dispatch and investment costs required to meet demand from households and businesses in NSW, as well as to provide significant 'competition benefits' by increasing the competitiveness of bidding in the wholesale market.

KEY DEVELOPMENTS SINCE THE PADR WAS RELEASED HAVE BEEN REFLECTED IN THIS PACR

The PADR for this RIT-T was published in January 2020, along with an accompanying market modelling report. On 12 February 2020, we held a public forum on the PADR that was attended by representatives from 17 organisations.

Formal submissions from eight parties were received in response to the PADR, seven of which have been published on our website (one submitter requested confidentiality).[2] While submissions covered a range of topics, there were six broad topics that were most commented upon, namely:

- timing and scope of the options included in the assessment;
- assumptions used in the market modelling;
- modelling outcomes;
- cost of the options;
- the incidence of market benefits;
- diversity benefits from an electrical 'loop'; and
- use of double-circuit versus single-circuit.

In addition, prior to, as well as after, receiving submissions, we held bilateral meetings with interested parties in order to further discuss the RIT-T assessment. These have played a pivotal role in being able to define and undertake the assessment in this PACR.

We have taken all feedback raised in submissions and stakeholder feedback sessions into account in undertaking our PACR analysis and have reflected two key points raised by submitters directly in the wholesale market modelling undertaken (i.e., applying 'realistic bidding' and whether modular power flow control (MPFC) can be expected to increase the net market benefits expected from the preferred option).

There have been a number of other key developments since the release of the PADR in January 2020, including:

- Snowy 2.0 receiving environmental approval and construction approval from the Federal government in mid-2020;
- the final 2020 ISP being released by AEMO in July 2020, which concluded that HumeLink is a 'low regret' investment and represents an 'actionable ISP project';
- the NSW Government publishing its Electricity Infrastructure Roadmap in November 2020, which was legislated in December 2020, setting out a commitment to a number of minimum objectives in terms of developing Renewable Energy Zones (REZs) in NSW;
- the new actionable ISP framework being finalised under the National Electricity Rules (NER) and the Australian Energy Regulator (AER) finalising the new cost benefit analysis guideline to make the ISP actionable;
- the announcement of new gas plants in NSW, the early retirement of Yallourn power station in Victoria and the Victorian 'Big Battery';
- clarification from the AER over September and October 2020 regarding applying a multi-stage contingent project application (CPA) to HumeLink (in order to provide certainty regarding funding for deriving more accurate costings);
- the AER approving the EnergyConnect contingent project at the end of May 2021; and
- progression of ecological surveys and community and stakeholder engagement activities in parallel to the RIT-T process to inform the subsequent Environmental Impact Statement (EIS) for HumeLink.

1. New generators will connect to the transmission network at various locations. The connection works are funded by the respective generator and are outside the scope of this RIT-T, which examines reinforcing the shared network.
2. https://www.transgrid.com.au/what-we-do/projects/current-projects/Reinforcing%20the%20NSW%20Southern%20Shared%20Network

Executive summary (continued)

The assessment in this PACR reflects these developments. It also builds on the analysis in the PADR through:

- expanding the analysis in response to submissions on the PADR;
- focussing the RIT-T analysis on the seven options with the greatest expected net market benefits;
- refining the option cost estimates, including the estimation of the environmental offset costs required for each network topology;
- undertaking the studies required to inform a view on lightning and bushfire risks, and how they can be mitigated, for options involving double-circuit portions;
- updating the assessment to fully align with the assumptions and outcomes in the 2020 ISP and Inputs, Assumptions and Scenarios Report (IASR), as well as the 2020 Electricity Statement of Opportunities; and
- further investigating competition benefits and finding that they are material to the assessment.

SEVEN OPTIONS HAVE BEEN ASSESSED IN THIS PACR

Based on the net present value (NPV) assessment in the PADR, and further detailed screening of the options considered, the list of credible options has been refined since the PADR to ensure that the top-ranked options are able to be assessed at a greater level of detail as part of the PACR.

The analysis in the PACR focuses on seven options that are expected to have the greatest net market benefits overall. Specifically, this PACR assesses options across the following three different topologies:

1. Topology 1 – a 'direct' path between Maragle and Bannaby:
   - Option 1A, Option 1B and Option 1C from the PADR
2. Topology 2 – a path between Maragle and Bannaby via Wagga Wagga that would open up additional capacity for new renewable generation in southern NSW:
   - Option 2B and Option 2C from the PADR
3. Topology 3 – a wider footprint via Wagga Wagga, that would open up both direct and additional capacity for new renewable generation in southern NSW:
   - Option 3B and Option 3C from the PADR

The PACR does not assess the 'Topology 4' options from the PADR (involving new transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby and direct between Bannaby and Sydney). These options have significantly greater revised costs than the other options (in the order of $4.7 billion to $5 billion) and are not expected to provide commensurately greater market benefits than the other options.

The PACR also does not assess Option 2A or Option 3A from the PADR (the two 330 kV build and operate options of these network topologies) since they were found to have significantly lower benefits than the other options.

We have investigated different circuit configurations of the top performing network topologies and operating capacities in the PADR and PACR analysis (i.e., 'Option 2C' and 'Option 3C'). The outcome of this process is that Option 2C and Option 3C from the PADR are presented in the PACR as complete double-circuit options, which allows significant cost reductions relative to where they are constructed as either a single-circuit, or a combination of single- and double-circuit, configuration. Additional work undertaken since the PADR assessing the risks involved with double-circuit configuration, compared to single-circuit, and how these risks can be mitigated, has enabled these two options to be refined as part of this PACR.

WE HAVE UNDERTAKEN A POSITIONING ASSESSMENT TO INFORM THE ULTIMATE RIT-T ANALYSIS

We have undertaken a positioning assessment in this PACR that assesses all seven credible options across each of the four scenarios included by AEMO in its 2020 ISP. This positioning analysis covers all market benefits with the exception of competition benefits, since the modelling required to estimate competition benefits is considerable for each option, whilst the outcome is not expected to be materially different across options. Competition benefits have then been estimated for the two top-ranked options coming out of the positioning assessment. We consider this to be a proportionate approach for this RIT-T.

Executive summary (continued)

Uncertainty is captured under the RIT-T framework through the use of scenarios, which reflect different assumptions about future market development, and other factors that are expected to affect the relative market benefits of the options being considered.

Four core scenarios have been considered as part of this PACR, which are intended to cover a wide range of possible futures and are aligned with the AEMO 2020 ISP 'central', 'slow-change', 'fast-change' and 'step-change' scenarios. The four scenarios differ in relation to key variables expected to affect the market benefits of the options considered, including demand outlook, Distributed Energy Resources (DER) uptake, assumed generator fuel prices, assumed emissions targets, retirement profiles for coal-fired power stations, timing of major transmission augmentations and generator and storage capital costs.

Figure E.1 – Structure to the PACR assessment

Positioning Assessments

Seven options

TOPOLOGY 1
A 'direct' path between Maragle and Bannaby

Option 1A, Option 1B & Option 1C

TOPOLOGY 2
A path between Maragle and Bannaby via Wagga Wagga that would open up additional generation in southern NSW

Option 2B & Option 2C

TOPOLOGY 3
A wider footprint via Wagga Wagga, that would open up both direct and additional capacity for renewable generation in southern NSW

Option 3B & Option 3C

Seven catagories of market benefit

- Fuel consumption in the NEM arising through different patterns of generation dispatch.
- Changes in costs for parties, other than thr RIT-T proponent (i.e., changes in investment in generation and storage)
- Differences in unrelated transmission investment (in particular, the cost of connecting REZ)
- Changes in involuntary load curtailment
- Changes in voluntary load curtailment
- Changes in network losses
- Option value associated with the flexible 500kV options (i.e., options 2B and 3B)

RIT-T Results

Two options

OPTION 2C
Four new 500kV transmission lines, tie transformers and switchgear following 'topology 2'

OPTION 3C
Three new 500kV transmission lines, tie transformers and switchgear following 'topology 3'

Eight categories of market benefit

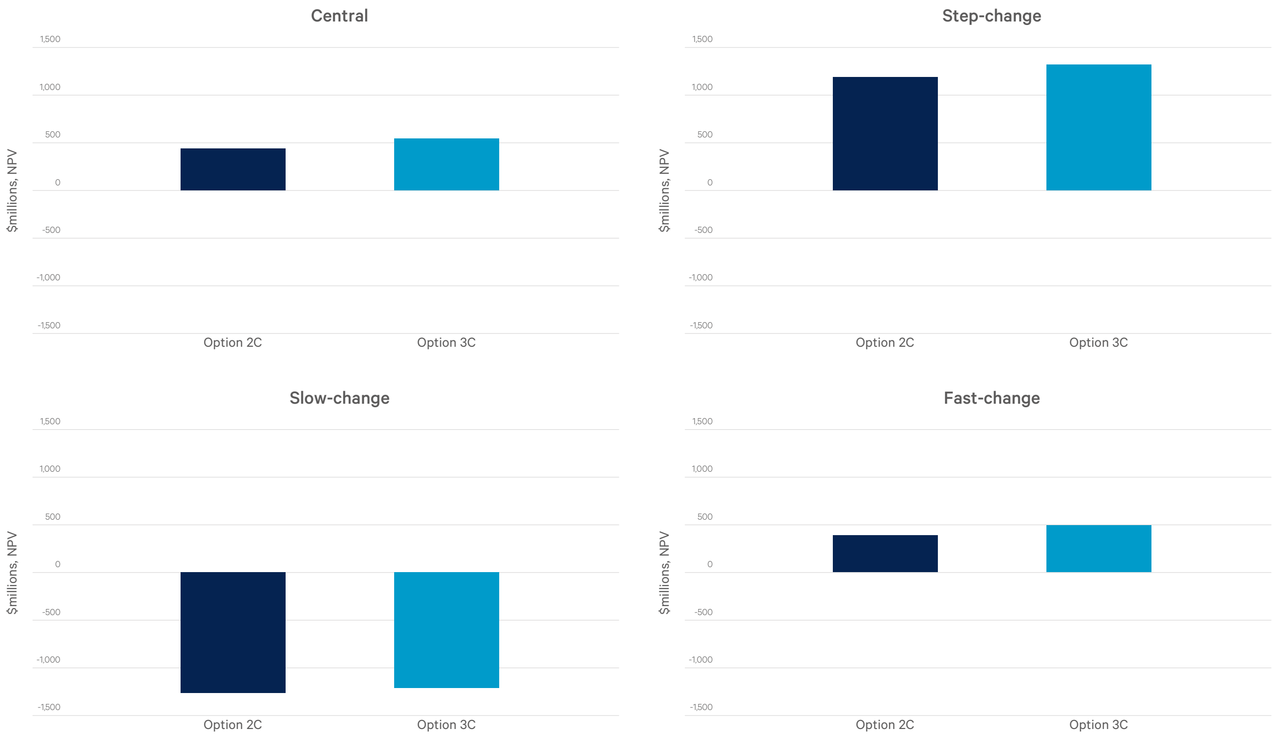
- The seven categories estimated under the positioning assessment
- Competition benefits

Executive summary (continued)

THE PREFERRED OPTION IS NEW 500 KV DOUBLE-CIRCUIT LINES IN AN ELECTRICAL 'LOOP' BETWEEN MARAGLE, WAGGA WAGGA AND BANNABY

The results of the PACR assessment find that Option 3C, comprised of new 500 kV double-circuit lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby, provides the greatest net benefits across all scenarios. Option 3C is found to have positive net benefits under all scenarios investigated, except for the slow-change scenario.

Figure E.2 – Estimated net benefits for each scenario, $2020/21[3]



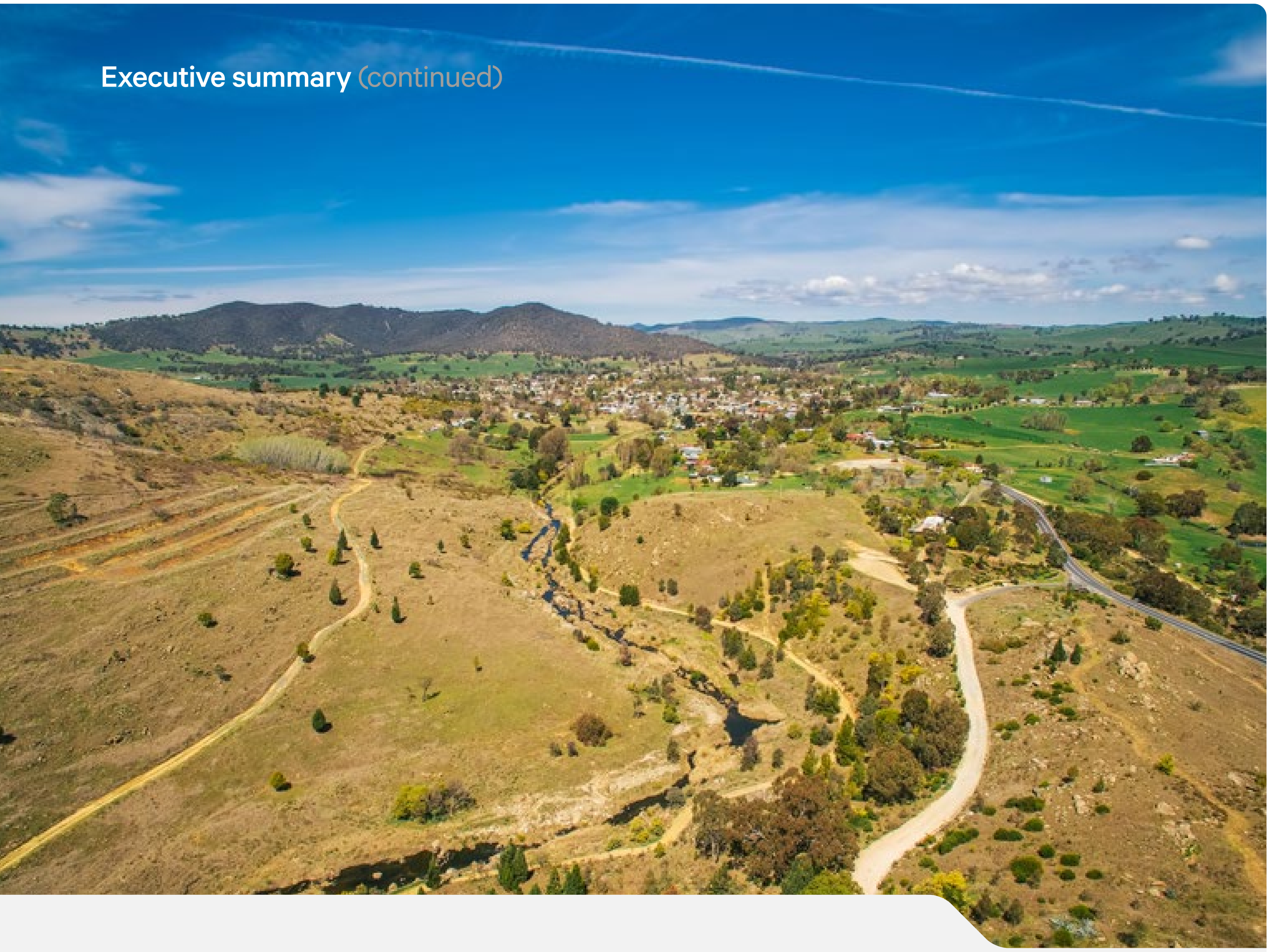
Note: The two options shown above reflect those with the greatest expected net benefits based on a positioning assessment undertaken across the full seven credible options. The net market benefits estimated for each of the other five options are presented in the body of this PACR.

While the slow-change scenario finds negative net benefits for both options, we note that this scenario is considered the least likely of the four scenarios and is given a 10 per cent weighting in the analysis, consistent with the recommended weighting in the 2020 ISP.[4] In addition, we note that recent commentary from the ESB suggests that the NEM is in fact tracking closest to the step-change currently.[5]

Under all scenarios, the benefits for Option 3C are primarily driven by avoided, or deferred, costs associated with generation and storage build. Avoided generator fuel costs, competition benefits and avoided transmission capital costs to connect new REZs make up the vast majority of other market benefits estimated, with their relativities varying across the scenarios.

On a weighted-basis, Option 3C is expected to deliver approximately $491 million of net benefits and is ranked first out of the options assessed (with estimated net benefits that are 23 per cent greater than the second-ranked option, Option 2C). Option 3C is therefore the preferred option overall under the RIT-T.

3. All dollars presented in this report are $2020/21, unless otherwise stated.
4. AEMO, *2020 Integrated System Plan*, July 2020, p. 86
5. See Renew Economy, "We are headed for step change:" ESB's Kerry Schott on new market design, Parkinson, G., 30 September 2020 (accessed via https://reneweconomy.com.au/we-are-headed-for-step-change-esbs-kerry-schott-on-new-market-design-89487/ on 7 July 2021), Argus Media, Australia tops step-change energy transition scenario, Morrison, K., 7 May 2021 (accessed via https://www.argusmedia.com/en/news/2212777-australia-tops-stepchange-energy-transition-scenario on 7 July 2021) & ESB, The Health of the National Electricity Market 2020, Volume 1: The ESB Health of the NEM Report, 5 January 2020, p. 8



Executive summary (continued)

FURTHER INFORMATION AND NEXT STEPS

This PACR represents the final stage in the RIT-T process.

Activities not related to the RIT-T but necessary to progress assessment of the project in order to achieve approval, are also being undertaken, including preparation of an Environmental Impact Statement (EIS) under the NSW planning approval pathway, managed by the Department of Planning, Industry and Environment (DPIE).

Following clarification from the AER over September and October 2020,[6] we are intending to submit two CPAs to the AER in relation to the regulatory cost recovery for the project, namely:

- 'Initial CPA' – will seek cost recovery for works to-date and the cost of the works necessary to develop a robust cost estimate for the project, based on the preferred option; and
- 'Final CPA' – will seek cost recovery for the implementation costs, including construction cost of the project, once a final estimate is available (this CPA will cover the bulk of the project cost).

In each case, AEMO's 'feedback loop' will be applied to the estimated costs of the entire project, in line with the new actionable ISP Rules. This will provide stakeholders with additional confirmation that the project remains consistent with AEMO's ISP 'optimal development path', at the costs included in the CPA. For the initial CPA we envisage that the cost estimate used for the feedback loop will reflect the cost of the option included in the RIT-T PACR. The feedback loop may then need to be applied again for the final CPA, based on the final cost estimate for the project.[7]

We note that the RIT-T does not address line route specifics for the preferred option[8] and, instead, these are scoped by the TNSP and assessed within the EIS. Planning approval would only be granted by the NSW Minister for Planning and Public Spaces following extensive, genuine community and stakeholder consultation and demonstration that environmental impacts can be effectively managed or mitigated. This process is currently underway and will continue following the conclusion of this RIT-T.

Further details in relation to this project can be obtained from regulatory.consultation@transgrid.com.au

6. https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/contingent-projects/transgrid-humelink-contingent-project/aer-position
7. TransGrid letter to AER - Humelink - Staging of the regulatory process, 14 September 2020, p. 2. AEMO would not apply the feedback loop at the final CPA stage if the total cost of the project remains at or below that used for the feedback loop for the initial CPA.
8. Instead, the RIT-T approval process reviews, and publicly consults on, a TNSP's application for new investment to meet an identified need. Overall, it identifies the technical solution to the need that provides the greatest net benefit to the NEM overall. This RIT-T process is undertaken in consultation with consumers, AEMO, Registered Participants and other interested parties regarding the investment options under consideration.

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1. Introduction

The National Electricity Market (NEM) is currently undergoing rapid change as the sector transitions to lower carbon emissions and greater uptake of new technologies. In NSW, coal-fired generators are expected to begin to close from 2022, with this capacity being replaced with new generation, including substantial new investment in renewable generation.

There are currently substantial new renewable generation developments anticipated in southern NSW, with projects in construction or under development currently totalling 1,900 MW. In addition, Snowy 2.0 will provide a new source of generation to meet future demand in the major load centres of NSW and to 'firm' supply from the new renewable generation.

In January 2020, we released a Project Assessment Draft Report (PADR) as part of the Regulatory Investment Test for Transmission (RIT-T) to progress the assessment of investments that increase transfer capacity of the shared transmission network between southern New South Wales and the major load centres within the state. The PADR followed the Project Specification Consultation Report (PSCR) released in June 2019.

The PADR drew on submissions to the PSCR and assessed twelve investment options, differing in topologies and operating capacity. The 500 kV options connected between Maragle, Wagga Wagga and Bannaby (i.e., Option 2C and Option 3C) were found to provide the greatest net benefits across all scenarios. Overall, the 500 kV electrical 'loop' reinforcement (Option 3C) was the preferred option due to the additional risk reduction benefits it provides through its more diverse path than for Option 2C.

There have been a number of key developments since the release of the PADR, including:

- Snowy 2.0 receiving environmental approval and construction approval from the Federal government in mid-2020;
- the final 2020 ISP being released by AEMO in July 2020, which concluded that HumeLink is a 'low regret' investment and represents an 'actionable ISP project';
- the NSW Government publishing its Electricity Infrastructure Roadmap in November 2020, which was legislated in December 2020, setting out a commitment to a number of minimum objectives in terms of developing Renewable Energy Zones (REZs) in NSW;
- the new actionable ISP framework being finalised under the NER and the AER finalising new cost benefit analysis guidelines to make the ISP actionable;
- the announcement of new gas plants in NSW, the early retirement of Yallourn power station in Victoria and the Victorian 'Big Battery';
- clarification from the AER over September and October 2020 regarding applying a multi-stage contingent project application (CPA) to HumeLink (in order to provide certainty regarding funding for deriving more accurate costings);
- the AER approving the EnergyConnect contingent project at the end of May 2021; and
- progression of ecological surveys and community and stakeholder engagement activities in parallel to the RIT-T process to inform the subsequent Environmental Impact Statement (EIS) for HumeLink.

The assessment in this PACR reflects these developments. It also builds on the analysis in the PADR through:

- expanding the analysis in response to submissions on the PADR;
- focussing the RIT-T analysis on the seven options with the greatest expected net market benefits;
- refining the option cost estimates, including the environmental offset costs required for each topology;
- undertaking the studies required to inform a view on lightning and bushfire risks, and how they can be mitigated, for options involving double-circuit portions;
- updating the assessment to fully align with the assumptions and outcomes in the 2020 ISP and IASR, as well as the 2020 ESOO; and
- further investigating competition benefits and finding that they are material to the assessment (consistent with previous commentary by Frontier Economics for these types of investments).

1. Introduction (continued)

This report presents the final findings of the RIT-T assessment, including confirming that new 500 kV lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby is the preferred network topology and operating capacity. Specifically, the PACR analysis finds that Option 3C, where it is now assumed that all new lines are built as a double-circuit configuration, is expected to maximise overall net benefits. Our finding is consistent with the network topology and operating capacity of HumeLink in the final 2020 ISP.

All transmission lines for the preferred option are to be constructed in a double-circuit configuration to minimise the overall costs to consumers. This reflects a change since the PADR and represents a refinement of the ISP candidate option, which reduces the investment cost. This has been enabled through undertaking a detailed assessment of the risks involved with adopting double-circuit lines for the specific options considered, compared to single-circuit, and how these can be mitigated to an acceptable level.

The RIT-T approval process reviews, and publicly consults on, a TNSP's application for new investment to meet an identified need. Overall, it identifies the technical solution to the need that provides the greatest net benefit to the NEM overall. This RIT-T process has been undertaken in consultation with consumers, AEMO, Registered Participants and other interested parties regarding the investment options under consideration.

In the case of new transmission line investments, the RIT-T does not address line route specifics for the preferred option[9] and, instead, these are scoped by the TNSP and assessed within the EIS. Planning approval would only be granted by the NSW Minister for Planning and Public Spaces following extensive, genuine community and stakeholder consultation and demonstration that environmental impacts can be effectively managed or mitigated. This process is currently underway and will continue following the conclusion of this RIT-T.

1.1 ROLE OF THIS REPORT

This PACR is the final consultation document in the RIT-T process assessing options for reinforcing the Southern Shared Network of New South Wales to best serve load centres in New South Wales.

This report:

1. identifies and confirms the market benefits expected from reinforcing the Southern Shared Network of New South Wales, based on the most recent final assumptions and forecasts developed and consulted on by AEMO at the time of this assessment;
2. summarises points raised in submissions to the PADR and the accompanying consultation material, and highlights how these have been addressed in the RIT-T analysis;
3. describes the options that have been assessed under this RIT-T;
4. presents the results of the updated NPV analysis for each of the credible options assessed;
5. describes the key drivers of these results, and the assessment that has been undertaken to ensure the robustness of the conclusion; and
6. identifies the overall preferred option of the RIT-T, i.e., the option that is expected to maximise net benefits.

Overall, a key purpose of this PACR is to provide interested stakeholders the opportunity to review the analysis and assumptions and have certainty and confidence that the preferred option has been robustly identified as optimal.

We are also releasing supplementary reports on our website to complement this PACR. Detailed cost benefit results are included as a spreadsheet appendix accompanying this report.

1.2 FURTHER INFORMATION AND NEXT STEPS

This PACR represents the final stage in the RIT-T process.

Activities not related to the RIT-T but necessary to progress assessment of the project in order to achieve approval are also being undertaken, including the Environmental Impact Statement process. Following clarification from the AER over September and October 2020,[10] we are intending to submit two contingent project applications (CPAs) to the AER in relation to the regulatory cost recovery for the project, namely:

- 'Initial CPA' – will seek cost recovery for works to-date and the cost of the works necessary to develop a robust cost estimate for the project, based on the preferred option; and
- 'Final CPA' – will seek cost recovery for the implementation costs, including construction cost of the project, once a final estimate is available (this CPA will cover the bulk of the project cost).

In each case, AEMO's 'feedback loop' will be applied to the estimated costs of the entire project, in line with the new actionable ISP Rules. This will provide stakeholders with additional confirmation that the project remains consistent with AEMO's ISP 'optimal development path', at the costs included in the CPA. For the initial CPA we envisage that the cost estimate used for the feedback loop will reflect the cost of the option included in the RIT-T PACR. The feedback loop may then need to be applied again for the final CPA, based on the final cost estimate for the project.[11]

Going forward, we note that development of the project may be subject to delays including any objection processes. The cost of such delays is at this point indeterminate.

Further details in relation to this project can be obtained from regulatory.consultation@transgrid.com.au

9. Instead, the RIT-T approval process reviews, and publicly consults on, a TNSP's application for new investment to meet an identified need. Overall, it identifies the technical solution to the need that provides the greatest net benefit to the NEM overall. This RIT-T process is undertaken in consultation with consumers, AEMO, Registered Participants and other interested parties regarding the investment options under consideration.
10. https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/contingent-projects/transgrid-humelink-contingent-project/aer-position
11. TransGrid letter to AER - Humelink - Staging of the regulatory process, 14 September 2020, p. 2. AEMO would not apply the feedback loop at the final CPA stage if the total cost of the project remains at or below that used for the feedback loop for the initial CPA.

2. Key developments since the PADR

SUMMARY OF KEY POINTS:

There have been a number of key developments external to the RIT-T since the release of the PADR, including:

- Snowy 2.0 receiving environmental approval and construction approval from the Federal government;
- the final 2020 ISP being released by AEMO in July 2020, which concluded that HumeLink is a 'low regret' investment and represents an 'actionable ISP project';
- the NSW Government publishing its Electricity Infrastructure Roadmap in November 2020, which was legislated in December 2020, setting out a commitment to a number of minimum objectives in terms of developing REZs in NSW;
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The assessment in this PACR reflects these developments. It also builds on the analysis in the PADR through:

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- focussing the RIT-T analysis on seven options with the greatest expected net market benefits;
- refining the option cost estimates, including the environmental offset costs required for each topology;
- undertaking the studies required to inform a view on lightning and bushfire risks, and how they can be mitigated, for options involving double-circuit portions;
- updating the assessment to fully align with the assumptions and outcomes in the 2020 ISP and IASR, as well as the 2020 ESOO; and
- further investigating competition benefits and finding that they are material to the assessment (consistent with previous commentary by Frontier Economics for these types of investments).

There have also been a range of other processes and developments that have necessitated the approximate 18 months between the PADR and PACR, including the NSW bushfires and COVID-19 during 2020.

2.1 KEY DEVELOPMENTS EXTERNAL TO THE RIT-T SINCE THE RELEASE OF THE PADR

There have been a number of key developments outside of this specific RIT-T process since the PADR was released in January 2020.

HumeLink is a significant transmission investment, being undertaken at a time in which there is a major energy transition with many moving parts. It is appropriate for the final RIT-T cost benefit assessment to have waited for key elements of these changes to have been confirmed, in order for the conclusion to incorporate as many of these important factors as possible.

Each of the key developments external to the RIT-T process since the PADR was released is outlined below.

2.1.1 Snowy 2.0 receiving final environmental approval and construction approval

In June 2020, the Federal Government gave final environmental approval for Snowy 2.0's main works.[12]

In August 2020, the Federal Government approved Snowy 2.0's main works construction, allowing construction to commence on the underground power station, waterways and access tunnels, and other supporting infrastructure.[13]

This confirms Snowy 2.0 as a 'committed project' under the RIT-T. This is consistent with AEMO's final 2020 ISP, which refers to Snowy 2.0 as committed and includes it in all scenarios.[14]

12. https://www.snowyhydro.com.au/news/australian-govt-green-lights-snowy-2-0-main-works-3/
13. https://www.snowyhydro.com.au/news/australian-govt-green-lights-snowy-2-0-main-works-3-2/
14. AEMO, *Integrated System Plan*, July 2020, pp. 33 & 51.

2. Key developments since the PADR (continued)

2.1.2 The final 2020 ISP reconfirmed the conclusion of the PADR

The final 2020 ISP, released by AEMO in July 2020, built on the 2018 ISP analysis and concluded that new 500 kV lines between Maragle, Wagga Wagga and Bannaby are a 'low regret' investment and represent an 'actionable ISP project'. This transmission upgrade is consistent with Option 3C under the RIT-T.

AEMO assumed the upgrade would be completed by 2025-26 as part of the optimal development path for the central scenario, the fast-change scenario and the step-change scenario.[15] AEMO stated that, while HumeLink is not part of the least-cost development path under the slow-change scenario, it represents a 'low-regret' investment given the relatively low likelihood of this scenario (assigning this scenario 10 per cent weighting) and so included it in all candidate development paths.[16]

2.1.3 Legislation of the NSW Government's Electricity Infrastructure Roadmap

The NSW government published its Electricity Infrastructure Roadmap (the Roadmap) in November 2020.[17] The Roadmap outlines a vision that transitions the NSW electricity sector towards a low emission generation fleet underpinned by increased transmission investment.

In December 2020, the Electricity Infrastructure Investment Bill 2020 passed the NSW parliament and gave legal effect to the key features of the Roadmap. In particular, section 44 of the legislation formalises the infrastructure objectives of the Roadmap that generation infrastructure from renewable energy sources of at least 30 MW generates at least the same amount of electricity in a year as:

- 8 GW of generation capacity from the New England REZ;
- 3 GW of generation capacity from the Central-West Orana REZ; and
- 1 GW of additional generation capacity in NSW.

The generation capacities set out above are referred to as 'minimum objectives' in the legislation, meaning they are objectives that relate to the period ending 31 December 2029.

While the Roadmap was not included in the final 2020 ISP, we have reflected it in the market modelling for the PACR since it is now legislated (and note this approach is consistent with the draft 2021 IASR assumptions). Specifically, we have applied the following assumptions regarding the Roadmap:

- 8 GW of transmission capacity from the New England REZ;
- 3 GW of generation and transmission capacity from the Central-West Orana REZ;
- 1 GW additional generation capacity from other NSW REZs; and
- for all scenarios, except the slow change, the target is assumed to be met by 2030 (for the slow-change, the target is assumed to be met by 2032).

In addition, all scenarios assume 2 GW long duration storage in 2029-30 and that the NNS, NCEN and Canberra zones have an approximately equal share of storage capacity. More detail on how the Roadmap has been incorporated can be found in the accompanying market modelling report.

AEMO is proposing to model the Roadmap as a minimum constraint of 12 GW on the development of new variable renewable energy in NSW in addition to generation that is committed. AEMO are not proposing to model specific REZ targets under the Roadmap and only the Central-West Orana REZ is considered anticipated.[18]

2.1.4 Finalisation of the new actionable ISP framework and AER guidelines

In March 2020 the ESB put forward its final recommendations in relation to Rule changes to introduce the 'actionable ISP' framework. These Rule changes came into effect from 1 July 2020. In August 2020, the AER finalised its new guidelines under this framework, including its new Cost Benefit Analysis guidelines. These guidelines set out how the cost benefit assessment should be undertaken for actionable ISP projects like HumeLink, including as part of the RIT-T.

As part of the transitional provisions in the Cost Benefit Analysis guidelines, the AER has stated that the RIT-T assessment for HumeLink is to apply the 2018 AER RIT-T guidelines, as opposed to the new guidelines, since the PADR was published ahead of the new guidelines.[19] However, going forward, actionable ISP projects are required to apply the new guidelines.

While the 2018 AER RIT-T guidelines provide some flexibility in the assumptions and scenarios that can be used in the RIT-T assessment,[20] the new actionable ISP guidelines are more prescriptive in the assumptions and scenarios that should be used, stating that the default assumptions should be drawn from AEMO's most recent Input and Assumptions Report (IASR) since they have been identified and developed through a robust consultation process with stakeholders.[21]

The assessment in this PACR applies the final 2020 IASR assumptions and scenarios, as well as updated demand assumptions from the final 2020 ESOO. We consider this consistent with the 2018 guidelines and also how the RIT-T will be applied to other actionable ISP projects under the new framework going forward. We have also confirmed in discussions with AEMO that it considers that we should apply the 2020 ISP and IASR assumptions.

We recognise that AEMO is close to completing its process of updating the assumptions in the IASR, which is expected to result in an updated set of assumptions (the 2021 IASR) to be used in the 2022 ISP. Consultation on these updated assumptions is currently on-going, with the final 2021 IASR expected to be published later in July this year. Notwithstanding that the 2020 ISP and IASR assumptions remain the latest final assumptions at the time of this RIT-T assessment, we have also undertaken a sensitivity using the draft 2021 IASR assumptions, to investigate the impact of changes in assumptions on the outcome of this RIT-T. This sensitivity finds that the draft 2021 IASR assumptions significantly increase the expected net benefits of the preferred option under the central scenario (see section 8.4.7).

15. AEMO, *Integrated System Plan*, July 2020, pp. 14 & 61-62.
16. AEMO, *Integrated System Plan*, July 2020, pp. 64 & 86.
17. Energy New South Wales, Electricity Infrastructure Roadmap, at https://energy.nsw.gov.au/government-and-regulation/electricity-infrastructure-roadmap.
18. AEMO, *Draft 2021 Inputs, Assumptions and Scenarios Report*, December 2020, pp. 44-45.
19. AER, *Guidelines to make the Integrated System Plan actionable*, Final Decision, August 2020, p. 19.
20. Specifically, the 2018 guidelines state that "RIT-T proponents should consider external documents, such as the most up-to-date material published by AEMO in developing the NTNDP, ISP, or similar documents when developing assumptions and inputs to use in a RIT-T analysis. It may be more appropriate to use alternative sources of information where there is evidence and good reason to demonstrate that this information is more up-to-date or is more appropriate to the particular circumstances under consideration…For clarity, it would be reasonable to only depart from default assumptions in limited cases, such as if there has been a material change in circumstances such that data in the most up-to-date ISP has been superseded or changed." [Emphasis added]. See: AER, Regulatory investment test for transmission, Application Guidelines, December 2018, p. 25.
21. AER, *Guidelines to make the Integrated System Plan actionable*, August 2020, p. 58 & AER, *Guidelines to make the Integrated System Plan actionable*, Final Decision, August 2020, p. 56.

2. Key developments since the PADR (continued)

2.1.5 The announcement of new gas plants in NSW, the early retirement of Yallourn power station and the Victorian 'Big Battery'

In early May 2021, there were two announcements regarding Federal Government funding for new gas-fired generators in NSW. Namely:

- on 3 May 2021, EnergyAustralia announced it would build the 316 MW Tallawarra B gas-hydrogen plant with $83 million in Government support;[22] and
- on 18 May 2021, the Federal Government announced it will spend up to $600 million to build a new 660 MW gas plant at Kurri Kurri in NSW.[23]

We have considered the impact that these two developments have on the expected net benefits of the credible options in section 8.4.1, as one of the sensitivity tests conducted on the RIT-T outcome.

In November 2020, the Victorian Government announced its commitment to a 300 MW/450 MWh battery in Victoria (the Victorian 'Big Battery').[24]

In March 2021, EnergyAustralia announced that the Yallourn power station in Victoria's Latrobe Valley will retire in mid-2028.[25] The wholesale market modelling undertaken for this PACR applies economic retirement to all coal-fired generators (as outlined in section 6.1) and assumes that the retirement of Yallourn power station will occur no later than 1 July 2028.

2.1.6 Clarification from the AER regarding the CPA process for Humelink

We engaged with the AER over September and October 2020 following the ISP rule change introducing automatic CPA provisions in order to clarify the CPA process for Humelink. This concluded with the AER confirming that we can apply a multi-stage CPA to HumeLink in order to provide certainty regarding funding for deriving more accurate costings.[26]

2.1.7 The AER approving EnergyConnect

At the end of May 2021, the AER approved the costs for EnergyConnect. This represented the AER's final regulatory approval for the new South Australia to New South Wales interconnector to be built by ElectraNet and TransGrid. The AER's decision approved the final and efficient costs for EnergyConnect following contingent project applications from ElectraNet and TransGrid.[27]

2.1.8 Progression of the Environmental Impact Statement for HumeLink

We have been progressing studies for the EIS in parallel with the RIT-T process in order to meet the overall optimal project timeframes set-out in the ISP. Ecological surveys, desktop environmental investigations and community and stakeholder engagement activities undertaken since the PADR will inform the development of the EIS.

The NSW planning approval process, under the *Environmental Planning and Assessment Act 1979*, will formally commence with the lodgement of the Scoping Report to the NSW Department of Planning, Industry and Environment (DPIE). The Scoping Report will be published on the DPIE website and will be publicly accessible.

A parallel process with the Federal government will be undertaken to determine whether the project is a Controlled Action under the *Environment Protection and Biodiversity Conservation Act 1999*.

22. https://www.nsw.gov.au/media-releases/australias-first-green-hydrogen-and-gas-power-plant
23. https://www.minister.industry.gov.au/ministers/taylor/media-releases/protecting-families-and-businesses-higher-energy-prices
24. https://www.energy.vic.gov.au/renewable-energy/the-victorian-big-battery/the-victorian-big-battery-q-and-a
25. https://www.energyaustralia.com.au/about-us/media/news/energyaustralia-powers-ahead-energy-transition
26. https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/contingent-projects/transgrid-humelink-contingent-project
27. https://www.aer.gov.au/news-release/aer-approves-costs-for-project-energyconnect

2. Key developments since the PADR (continued)

2.2 HOW THE PACR ANALYSIS HAS BEEN UPDATED SINCE THE PADR

In addition to the key developments outlined above, we have also updated the analysis in response to points raised in submissions to the PADR and made a number of general refinements in line with this stage of the RIT-T process. Each of these updates are outlined below.

2.2.1 The analysis has been expanded in response to submissions on the PADR

The market modelling undertaken for this PACR explicitly covers points raised in submissions. In particular, and as summarised in more detail in section 4 below, submitters raised the following points in response to the PADR:

- that realistic bidding should be assumed in the modelling (as opposed to SRMC bidding); and
- whether a modular power flow control (MPFC) can add to the expected net benefits of the preferred option.

We have adopted realistic bidding as part of estimating the competition benefits for the top-ranked options (as outlined in section 7.3). We have also explicitly investigated a sensitivity in response to the second point (see section 8.4.3).

2.2.2 The analysis in this PACR focuses on the top-ranked options

The PADR assessed twelve different network options to provide additional transfer capacity on the NSW Southern Shared Network between the Snowy Mountains and the major load centres.

Based on the NPV assessment in the PADR and further detailed screening of the options considered, the list of credible options has been refined to ensure that the top-ranked options are able to be assessed at a greater level of detail as part of the PACR.

The analysis now focuses on seven options that are expected to have the greatest net market benefits overall. Specifically, this PACR assesses the options across the following three different topologies:

1. Topology 1 – a 'direct' path between Maragle and Bannaby:
   Option 1A, Option 1B and Option 1C from the PADR
2. Topology 2 – a path between Maragle and Bannaby via Wagga Wagga that would open up additional capacity for new renewable generation in southern NSW:
   Option 2B and Option 2C from the PADR
3. Topology 3 – a wider footprint via Wagga Wagga, that would open up both direct and additional capacity for new renewable generation in southern NSW:
   Option 3B and Option 3C from the PADR

The PACR does not assess the 'Topology 4' options from the PADR (involving new transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby and direct between Bannaby and Sydney). These options have significantly greater revised costs than the other options (in the order of $4.7 billion to $5 billion) and are not expected to provide commensurately greater market benefits than their counterparts following the three topologies outlined above at this point in time. Any assessment of increasing the transmission capacity between Bannaby and Sydney may form part of a future RIT-T.

The PACR also does not assess Option 2A or Option 3A from the PADR (the two 330 kV build and operate options of these network topologies) since they were found to have significantly lower benefits than the other options and, in particular, Option 3C in the PADR assessment. Specifically, these options were found to have net benefits that were 38 and 36 per cent lower than Option 3C respectively on a weighted basis in the PADR.

Overall, the options considered in this PACR differ in terms of their topology, circuitry and whether they are built at 330 kV or 500 kV (including whether they are built to 500 kV from the outset or provide optionality through being able to initially be operated at 330 kV and then upgraded to operate at 500 kV once conditions require the additional capacity).

2.2.3 Option costs have been refined

The capital cost of all credible options has been estimated to a greater degree of accuracy than presented in the PADR. Specifically, all credible options have been through a detailed cost estimation based on:

- concept designs for both transmission lines and substations;
- desktop geotechnical assessments;
- biodiversity offset assessments;
- updating market construction rates based on recent transmission projects;
- site testing and inspections requirements; and
- property desktop evaluation reports.

In addition, we have refined the assumption regarding annual operating costs based on more detailed cost assessment. We now assume this to be 0.5 per cent of each option's capital costs each year (excluding capital costs relating to biodiversity costs, since these are one-off and do not require ongoing operating costs).

2. Key developments since the PADR (continued)

2.2.4 Investigation of double-circuit options

We have investigated different circuit configurations of the top performing network topologies and operating capacities in the PADR and PACR analysis (i.e., 'Option 2C' and 'Option 3C'). The outworking of this process is that Option 2C and Option 3C from the PADR are presented in the PACR as complete double-circuit options, which allows significant cost reductions relative to where they are constructed as either a single-circuit, or a combination of single- and double-circuit, configuration.

In addition, while the other options are primarily single-circuit, they all now involve a 132 km double-circuit component west of Bannaby, an area where we consider bushfire risk is a more manageable risk, in order to reduce costs. We have not investigated complete double-circuit versions of these options, as we have for Option 2C and Option 3C, as any cost reductions are not expected to result in these options becoming top ranked options given their significantly lower net benefits than for Option 2C and Option 3C.

Additional work undertaken since the PADR assessing the lightning and bushfire risks involved with double-circuit, compared to single-circuit, and how these risks can be mitigated has enabled Option 2C and Option 3C to be refined as part of this PACR (which is outlined in section 4.7 and Appendix B.1.2).

2.2.5 Modelling assumptions have been updated to align with the final 2020 IASR, the 2020 ISP optimal development path and the ESOO published by AEMO

The modelling undertaken in this PACR aligns with the final assumptions and scenarios used by AEMO in the 2020 ISP (i.e., those in the final 2020 IASR) and updates demand for the final 2020 ESOO, both of which were published by AEMO in August 2020. This ensures the latest final set of consulted on assumptions and scenarios from AEMO at the time of preparing this PACR are taken into account and is consistent with the new actionable ISP framework (as discussed above).

The assessment also now models the retirement dates of coal-fired generators based on when it is economic for these plants to retire, as opposed to the broad range of dates applied in the PADR. The approach taken is consistent with what AEMO applied in the 2020 ISP and is covered in more detail as part of the accompanying market modelling report.

While the PADR reflected the majority of the final 2020 ISP assumptions, some were not available from AEMO when the PADR market modelling was undertaken and so were not able to be captured in the analysis at the time.

The assessment in this PACR now reflects all of the final 2020 IASR assumptions. The base case for the assessment also incorporates all of the other transmission investments included in the 2020 ISP's optimal development path.

The two key exceptions relate to key developments that have occurred since the 2020 ISP and are considered committed for the analysis, i.e.:

- the NSW Government publishing its Electricity Infrastructure Roadmap in November 2020, which was legislated in December 2020, setting out a commitment to a number of minimum objectives in terms of developing REZs in NSW (see section and the accompanying market modelling report for how the Roadmap has been reflected in the PACR analysis); and
- the Victorian 'Big Battery' announced by the Victorian Government in November 2020:
  - the 300 MW/450 MWh battery has been assumed in all base cases and option cases in the market modelling for this PACR. We note that, during the summer months, 250 MW of the battery will be reserved to provide the System Integrity Protection Scheme (SIPS) service and the remaining 50 MW can be deployed in the market by the operator on a commercial basis.[28]

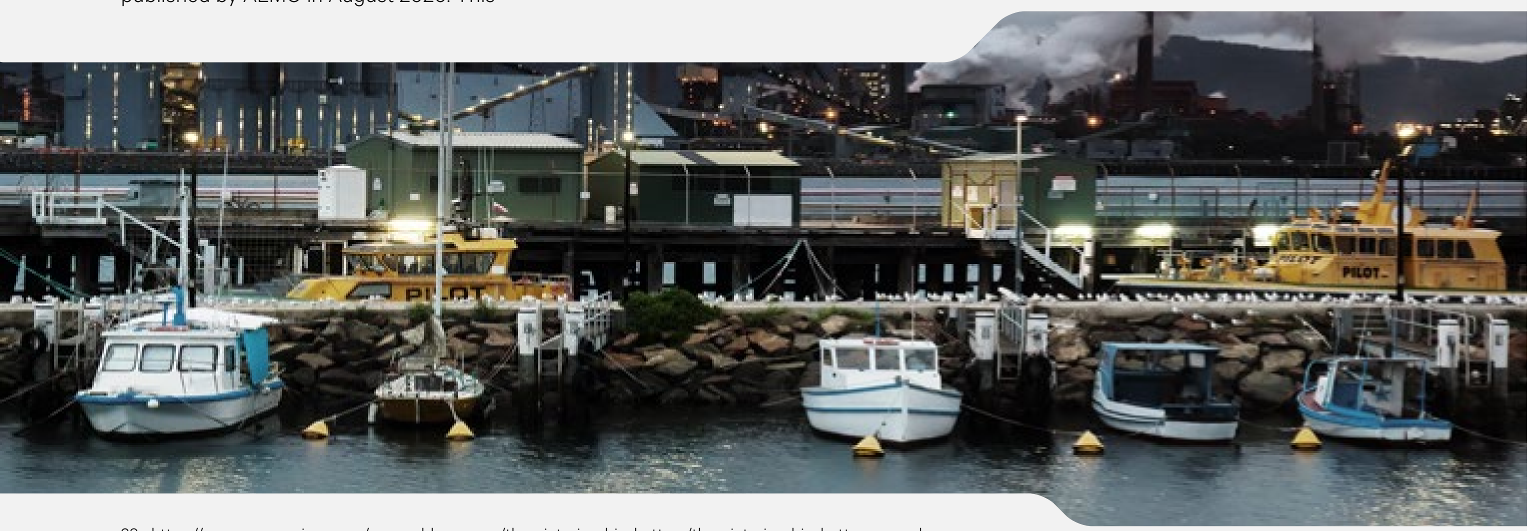
In addition, we have assumed an earlier commissioning date for VNI West under the central scenario than in the core 2020 ISP assumptions, consistent with AEMO's accelerated delivery date in the 2020 ISP (and the draft 2021 IASR timing). Specifically, we have assumed a timing of 2028/29 for VNI West under the central scenario.[29] We have also investigated a sensitivity assuming the core ISP timing of 2035/36 (see section 8.4.2).

The analysis in this PACR also applies an assumed timing for the preferred option of 2026/27. The assumed timing has been updated since the 2020 ISP (and PADR) to reflect our current best estimate of how long we expect the project will take to commission.

2.2.6 Further investigation of competition benefits

While the PADR concluded that we did not expect competition benefits to be material in terms of identifying the preferred option for this RIT-T, additional testing of expected competition benefits undertaken following the PADR has shown that they are in fact expected to constitute a substantial benefit category for this RIT-T. Failure to adequately consider competition benefits would therefore substantially underestimate the potential market benefits associated with HumeLink, and therefore the net market benefit.

As a consequence, we have now estimated competition benefits in this RIT-T. This is consistent with the AER's latest cost benefit analysis guidelines and is outlined in more detail in section 7.1.8 below.



28. https://www.energy.vic.gov.au/renewable-energy/the-victorian-big-battery/the-victorian-big-battery-q-and-a
29. While AEMO has an accelerated delivery date of 2027/28 for VNI West in the 2020 ISP (and draft 2021 IASR), we have assumed a commissioning of 1 July 2028 as this is our current view of the earliest practical delivery date.

3. Benefits from HumeLink

Scar tree survey – Scarred trees tell us where Aboriginal people used to live, what they may have used the tree for and also provide Aboriginal people today with a link to their culture and past

SUMMARY OF KEY POINTS:

- The investment considered under this RIT-T will allow future New South Wales demand and NEM emissions targets to be met at the lowest cost.
- The driver for the credible options considered in this PACR is to deliver a net economic benefit to consumers and producers of electricity and support energy market transition through:
  - increasing the transfer capacity between the Snowy Mountains and major load centres of Sydney, Newcastle and Wollongong;
  - enabling greater access to lower cost generation to meet demand in these major load centres; and
  - facilitating the development of renewable generation in high quality renewable resource areas in southern NSW as well as southern states, which will further lower the overall investment and dispatch costs in meeting NSW demand whilst also ensuring that emissions targets are met at the lowest overall cost to consumers.
- These sources of market benefit were included as the identified need for Humelink in the 2020 ISP.
- This PACR also finds that there are significant benefits expected from the preferred option through increasing the competitiveness of bidding in the wholesale market (referred to as 'competition benefits' under the RIT-T).
- This is a 'market benefit' RIT-T (as opposed to a 'reliability corrective action' RIT-T).
- While this section provides a high-level overview of the key benefits expected from Humelink, section 7.1 covers each of the eight specific categories of market benefit under the RIT-T that have been estimated.

The planned expansion of generation in southern New South Wales provides sources of generation that can be used to meet demand in the major load centres as existing New South Wales coal-fired generation retires. However, access to existing capacity from southern New South Wales is currently limited by constraints on the transmission network between the Snowy Mountains and Sydney, Newcastle and Wollongong at times of peak demand. Access to additional generation capacity would be similarly limited under the existing network configuration.

Investment to increase the transfer capacity between southern New South Wales and these major load centres will both relieve constraints that currently limit the use of existing generation capacity to supply these load centres and enable greater access to new generation as it develops.

In addition, the dispatchable generation that can be provided via the expanded storage capacity at Snowy Hydro can be used to 'firm' renewable generation and is expected to support the development of additional

3. Benefits from HumeLink (continued)

renewable generation in NSW, SA and VIC, as the NEM transitions to low-emission generation technologies.

Depending on the topology adopted, the investments being considered in this RIT-T also have the potential to:

- open up additional capacity for new generation (primarily renewable generation) in areas of southern NSW, which has recognised high-quality wind and solar resources;
- increase the transfer capacity between Victoria and NSW, which would provide NSW with access to additional generation in Victoria; and
- support additional transfer capacity between South Australia and NSW which will be provided by EnergyConnect (which is planned to terminate at Wagga Wagga), to also flow to Sydney.

Opening up additional capacity in areas of the NEM for renewable generation investment will also facilitate geographical diversity in renewable generation and lead to less variability in output as a result of local weather effects.

Within the context of the RIT-T assessment, greater output from renewable generation can be expected to primarily deliver the following classes of market benefit:

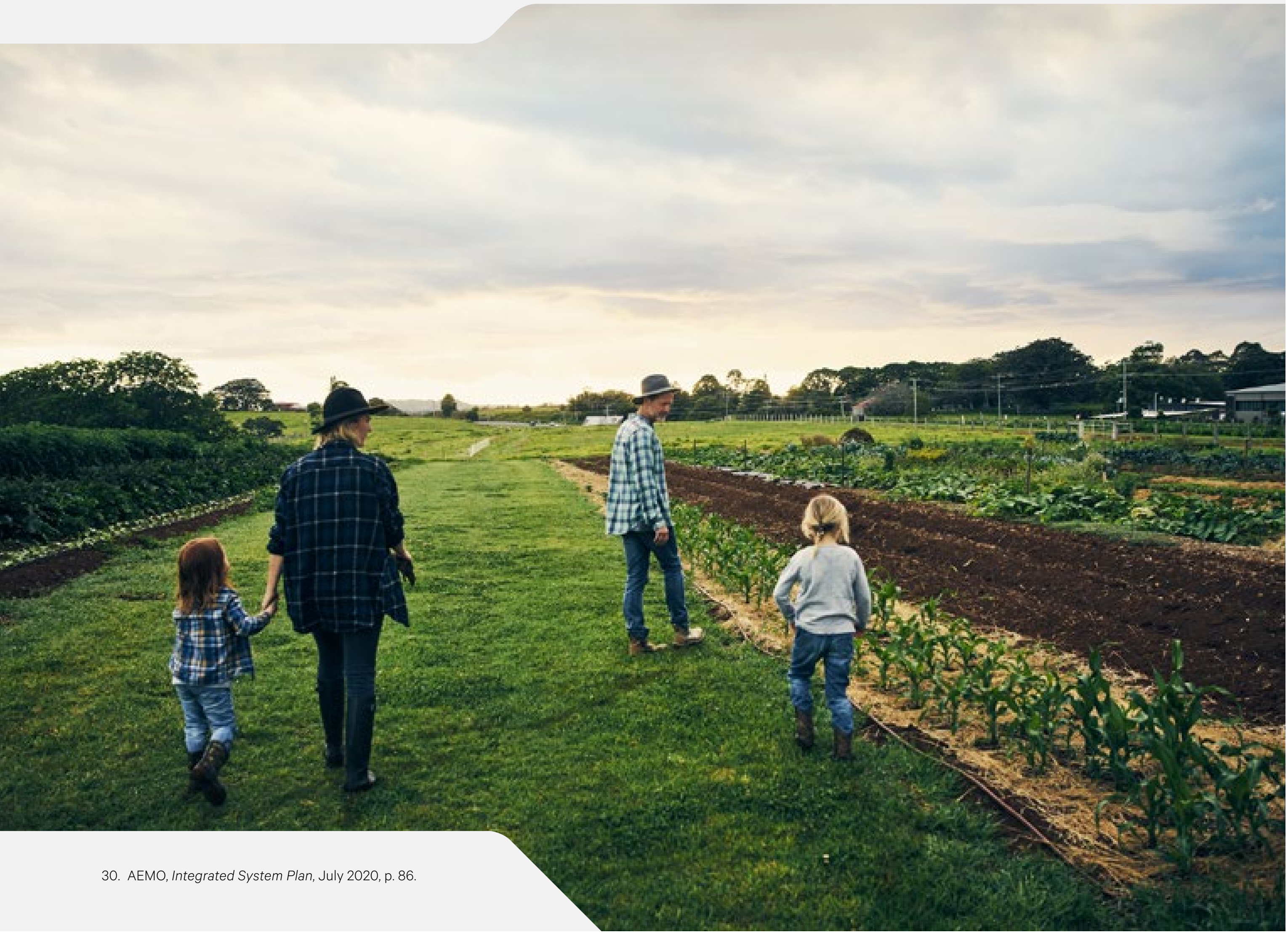
- further reductions in total dispatch costs, by enabling lower cost renewable generation to displace higher cost conventional generation;
- reduced generation investment costs, resulting from more efficient investment and retirement decisions, due to wind, solar and pumped hydro generation being able to locate at optimal high-quality locations rather than inferior locations; and
- avoided/lower intra-regional transmission investment associated with the development of Renewable Energy Zones (REZ).

The modelling in this PACR shows that, in the absence of investment under this RIT-T, alternative additional investment by market participants in technologies such as solar, gas-fired generation and other technologies such as large-scale batteries and pumped hydro investment in NSW in addition to that anticipated under the NSW government's Electricity Infrastructure Roadmap would be needed in the next twenty five years, in order to continue to meet New South Wales demand and system stability and security requirements, as existing dispatchable generation in New South Wales retires. Overall, the net cost to the market (and therefore ultimately to consumers) is expected to be higher under the 'do nothing' path, than if investment under this RIT-T proceeds.

The above sources of market benefit were included as the identified need for Humelink in the 2020 ISP.[30]

In addition, this PACR finds that the preferred option is expected to provide significant benefits to the NEM through facilitating more competitive bidding in the wholesale market (termed 'competition benefits' under the RIT-T). These benefits accrue through the option removing transmission constraints and allowing for an overall lower cost pattern of generation and storage being able to meet demand across the NEM (which ultimately reduces prices to end-consumers).

Section 7.1 discusses each of the eight specific categories of market benefit under the RIT-T that have been estimated as part of the PACR assessment.



30. AEMO, *Integrated System Plan*, July 2020, p. 86.

4. Consultation on the PADR has been incorporated in this analysis

SUMMARY OF KEY POINTS:

- We have undertaken extensive stakeholder consultation to investigate the potential credible options for reinforcing the Southern Shared Network of New South Wales to enable the southern NSW generation to best serve load centres in New South Wales and ensure the robustness of the RIT-T findings.
- This consultation has included publication of a separate detailed market modelling and assumptions report, a consultation session at the public forum on the PADR on 12 February 2020, briefing our Customer Panel, bilateral discussions with interested stakeholders, and the release of detailed analysis in response to stakeholder requests.
- The analysis presented in this PACR has been informed by this consultation, which has helped test the conclusions reached and ensure the robustness of the analysis.
- We thank all parties for their valuable input to the consultation process.

The PADR for this RIT-T was published in January 2020, along with an accompanying market modelling report. On 12 February 2020, we held a public forum on the PADR that was attended by representatives from 17 organisations (excluding TransGrid and the consultants that worked directly on the PADR preparation).

Formal submissions from eight parties were ultimately received in response to the PADR, seven of which have been published on our website (one submitter requested confidentiality).[31]

While submissions covered a range of topics, there were six broad topics that were most commented upon, namely:

- timing and scope of the options included in the assessment;
- assumptions used in the market modelling;
- modelling outcomes;
- cost of the options;
- the incidence of market benefits;
- diversity benefits from an electrical 'loop'; and
- use of double-circuit versus single-circuit.

In addition, prior to, as well as after, receiving submissions, we held bilateral meetings with interested parties in order to further discuss the RIT-T assessment. These have played a pivotal role in being able to define and undertake the assessment in this PACR.

The key matters raised in non-confidential submissions and stakeholder feedback sessions relevant to the RIT-T assessment are summarised in the following subsections, as well as our responses and how the matters raised have been reflected in the PACR assessment. Appendix D provides a full summary of all points raised as part of consultation on the PADR, most of which remain relevant notwithstanding the time passed since submissions were received.

4.1 TIMING AND SCOPE OF THE OPTIONS

A number of submitters commented on the timing and scope of the credible options. Specifically, the following topics were raised:

- the optimal timing of the preferred option and whether it can be delayed;
- whether the options should be extended to all include reinforcing the southern and western Sydney transmission network;
- whether the options can be staged to provide greater net benefits;
- why Option 3C does not require a phase shifting transformer (while Option 3B does); and
- whether the preferred option can be coupled with modular power flow control equipment to provide greater net benefits.

The points raised and our responses to each are set out below.

4.1.1 The optimal timing of the preferred option and whether it can be delayed

EnergyAustralia requested that the optimal timing under each scenario and sensitivity be demonstrated and enquired as to whether the investment decision can be delayed.[32]

The optimal timing of the HumeLink development has been investigated thoroughly by AEMO as part of the ISP optimal development path based on the outcomes under the four core scenarios. While the 2020 ISP assumes a Humelink project completion date of 2025/26, the analysis in this PACR applies an assumed timing for the preferred option of 2026/27. The assumed timing has been updated since the 2020 ISP (and PADR) to reflect our current best estimate of how long we expect the project will take to construct and commission.

4.1.2 Whether the options should be extended to include reinforcing the southern and western Sydney transmission network

Snowy Hydro suggested we should continue to investigate the possible future reinforcement of the southern and western Sydney transmission network to ensure the southern supply route meets future demand requirements.[33] Similarly, ERM Power considered it unclear whether the preferred option will require completion of the proposed additional 330 kV circuit between Bannaby

31. https://www.transgrid.com.au/what-we-do/projects/current-projects/Reinforcing%20the%20NSW%20Southern%20Shared%20Network
32. EnergyAustralia, p. 2.
33. Snowy Hydro, p. 2.

4. Consultation on the PADR has been incorporated in this analysis (continued)

and Sydney West as set out in Option 4A to accommodate the required higher flows from southern NSW towards the Sydney West switchyard, following the planned retirement of generation in the Hunter Valley and central coast sub-regions of NSW to deliver the calculated market benefits set out in the RIT-T.[34]

While an additional 330 kV circuit between Bannaby and Sydney West will help accommodate additional flow from southern NSW to the Sydney load centre, the NPV assessment finds that the costs of providing this additional capacity are not outweighed by the additional expected market benefits at this point in time. Specifically, the assessment in the PACR continues to find that the options including delivery of the Bannaby-Sydney West component in the same timeframe as the other transmission lines (i.e., options 4A, 4B and 4C) result in lower expected net market benefits than the equivalent options that do not include the Bannaby-Sydney West component (i.e., options 3A, 3B and 3C). This demonstrates that the Bannaby-Sydney West component is not expected to be incrementally net beneficial in the same timeframe as the other transmission lines. The 'topology 4' options have not been considered further in this PACR (as outlined in section 2.2.2).

We will continue to investigate strategic land acquisition between Bannaby to Sydney West to secure the property and easements for future development, due to the significant infrastructure development in the western Sydney area. However, this sits outside of the current RIT-T process.

EnergyAustralia queried whether the Bannaby to Sydney West transmission line (Line 39) would constrain optimal dispatch over the outlook period once the preferred option has been installed.[35]

We find that the binding percentage of time on the Bannaby to Sydney West constraint is forecast to be less than 1 per cent/year until the late 2030s and up to 4 per cent in later years of the study, once the preferred option has been implemented. While the binding hours do increase in the 2040s, any options to address this would be considered as part of a future RIT-T process.

4.1.3 Whether the options can be staged to provide greater net benefits

ERM Power suggested that consideration should be given to staging the preferred option and proposed that, while an initial segment between Wagga Wagga and Bannaby is warranted, the other elements of the project could be staged.[36]

The PADR investigated sensitivities under all scenarios that involve completing the Bannaby to Wagga Wagga and Wagga Wagga to Maragle transmission lines first, with the Bannaby to Maragle transmission line built at a later stage. These sensitivities found that, compared to when both stages are constructed at the same time, the expected gross market benefits of Option 3C fall under all scenarios (and were negative under the slow-change scenario). The PADR therefore concluded that staging the preferred option in this manner was not expected to provide net benefits over the non-staged version of Option 3C.

In addition, we do not consider it practical to build the Wagga Wagga to Bannaby segment ahead of the other lines due to the interaction with contractors and the cost synergies associated with building Wagga Wagga to Maragle segment (i.e., the sensitivity investigated as part of the PADR).

4.1.4 Why Option 3C does not require a phase shifting transformer (when Option 3B does)

ERM Power consider it unclear why Option 3B requires installation of a phase shifting transformer on Bannaby to Sydney West 330 kV line to control flows across this network flow path, while Option 3C will result in the delivery of higher flows to the 500 kV and 330 kV buses at Bannaby and does not have this same requirement.[37]

Power system assessment undertaken by TransGrid confirms that a phase shifting transformer is required for the 330 kV options but is not required for the 500 kV options due to the power sharing between 330 kV and 500 kV network beyond Bannaby. Specifically:

- for 500 kV options (e.g. options 1C, 2C and 3C), the power will flow into Bannaby 500 kV directly via HumeLink – a portion of the power will flow via the Bannaby to Mt Piper 500 kV lines and the rest will flow via the Bannaby 500/330/33 kV transformers and the Bannaby to Sydney West 330 kV line; while
- for 330 kV options, the power will flow into Bannaby 330 kV directly via HumeLink – the majority of the power will flow via the Bannaby to Sydney West line, while the rest will flow via the Bannaby 500/330/33 kV transformer and the Bannaby to Mt Piper 500 kV lines.

The thermal constraint on the Bannaby to Sydney West line is the most critical limit between Bannaby and Sydney load centres. The assessment confirms that the 500 kV options will have less power

34. ERM Power, p. 4.
35. EnergyAustralia, p. 5.
36. ERM Power, pp. 2 & 3.
37. ERM Power, p. 3.

4. Consultation on the PADR has been incorporated in this analysis (continued)

sharing on the Bannaby to Sydney West line due to transformer impedance than the 330 kV options.

4.1.5 Whether the preferred option can be coupled with modular power flow control equipment to provide greater net benefits

Smart Wires propose the use of MPFC equipment as part of the project in order to extract the maximum capability from the existing transmission system. Smart Wires suggest that MPFC should be assessed based on an evaluation of the net economic benefits it would provide in the context of the preferred solution.[38]

We have investigated a sensitivity where the proposed MPFC is added to the preferred option and find that, while it will help accommodate additional power flow from Southern NSW to Sydney load centre by changing the impedance of Bannaby to Sydney West line, the costs of providing this additional capacity are not outweighed by the additional expected market benefits at this point in time. Section 8.4.3 presents the results of this analysis.

4.2 ASSUMPTIONS USED IN THE MARKET MODELLING

As outlined in section 2.2.5, the market modelling assumptions used in the PACR assessment have been updated since the PADR to align with the final 2020 ISP assumptions and final 2020 ESOO. This ensures the latest final set of consulted on assumptions and scenarios from AEMO at the time of preparing this PACR are taken into account and is consistent with the new actionable ISP framework.

Notwithstanding, several submissions to the PADR commented on the assumptions used in the market modelling and remain relevant. We address each of these points below.

ERM Power considered that the modelling should calculate the net market benefit using the total calculated estimated cost for EnergyConnect and VNI West as well as HumeLink. ERM Power also stated that the market benefit modelling should be conducted on the HumeLink project in isolation with both the EnergyConnect and VNI West projects excluded.[39]

We have sought to apply the actionable ISP framework to this RIT-T and align its key assumptions with those used in the final 2020 ISP. Excluding EnergyConnect and VNI West (or including their costs) does not fit with this framework, since they are included in all 2020 ISP scenarios (with the exception of VNI West being excluded from the slow-change scenario).

Further, the AER guidelines make clear that all actionable ISP projects besides the one being assessed should be included in the base case.[40] In the case of EnergyConnect, its costs have now been approved by the AER and therefore it will proceed as planned in the base case.[41] In the case of VNI West, we have adopted the final 2020 ISP timing for all scenarios with the exception of the central scenario (for the reasons outlined in section 2.2.5) but have also investigated a sensitivity analysis that adopts the final 2020 ISP timing under the central scenario and find that, while this reduces the estimated net benefits of the options, it does not change the outcome of the RIT-T (as outlined in section 8.4.2).

ERM Power consider that low demand sensitivities should be run on all modelled scenarios to assess the impact of events like smelters shutting down.[42]

We have not investigated the effects of a demand shock as part of the PACR and consider that a demand shock of the severity (large), timing (early in the assessment period) and location (NSW) to affect the conclusion of this RIT-T is highly unlikely. For example, while the Tomago aluminium smelter shutting down is considered one example of such a shock, the Tomago Aluminium Company has signed an eleven year base-load power supply contract with Macquarie Generation that expires in 2028 and therefore is unlikely to shut down prior to the expiry of that contract.[43]

EnergyAustralia requested clarification as to whether the central real, pre-tax discount rate of 5.9 per cent, as well as the sensitivities (which were 2.85 per cent and 8.95 per cent at the time of the PADR), have been applied to the discounted cash flow analysis and generator hurdle rates as well as when determining the annualised costs of the transmission investment and therefore in determining the optimal timing.[44]

We have adopted the same approach as AEMO for the ISP in terms of the discount rates and WACC. We have applied the different discount rate sensitivities to the NPV assessment, as is required under the RIT-T, with the market modelling based on a single discount rate (ie, consistent the approach adopted in the 2020 ISP, which was consulted on by AEMO).

EnergyAustralia also requested clarification on how the departures from the 2020 ISP assumptions, including advanced closing of half of the coal power station capacity in the NEM by 2 to 5 years in three of the four scenarios, affects the net benefits and timing of the preferred option.[45]

The modelling undertaken in this PACR aligns with the final assumptions and scenarios used by AEMO in the 2020 ISP and 2020 ESOO, consistent with the now finalised actionable ISP framework.

EnergyAustralia expressed concern that the modelling of hydro generation assumes perfect foresight, is targeted to reduce total system costs and that these assumptions are inconsistent with reality. EnergyAustralia requested consideration of whether the benefits are overstated because of this.[46]

The core market modelling assumes short run marginal cost (SRMC) bidding, which is a feature of least-cost market development modelling and is standard practice in projecting generation and investment requirements in wholesale electricity markets as well as a requirement under the RIT-T.[47] Similar approaches have been utilised by AEMO in the 2018 and 2020 ISP, previous

38. Smart Wires, pp. 2-3.
39. ERM Power, p. 2.
40. AER, *Guidelines to make the Integrated System Plan actionable*, August 2020, pp. 58-59.
41. https://www.aer.gov.au/news-release/aer-approves-costs-for-project-energyconnect
42. ERM Power, p. 3.
43. https://www.csr.com.au/investor-relations-and-news/csr-news-releases/2010/tomago-aluminium-secures-long-term-power-supply-contract
44. EnergyAustralia, p. 2
45. EnergyAustralia, p. 3.
46. EnergyAustralia, p. 4.
47. AER, *Regulatory Investment Test for Transmission*, June 2010, pp. 8-9.

4. Consultation on the PADR has been incorporated in this analysis (continued)

NTNDPs and RIT-Ts that have all assessed the relative expected benefits of alternative network investments.

We do not consider that SRMC bidding in least-cost modelling would necessarily overstate the estimated benefits, on account of the bidding type assumed feeding into both the base case for the RIT-T assessment and the option cases. This means that the effect of assuming least-cost modelling, over market-driven modelling, is ambiguous and may actually understate the estimated benefits since, by definition, least-cost modelling assumes lower cost generators are dispatched than under market-driven modelling.

EnergyAustralia also questioned whether Snowy Hydro's portfolio after the construction of Snowy 2.0 could influence dispatch outcomes away from the perfect outcomes represented in SRMC bidding and requested confirmation as to whether historical peak demand coincident factors are maintained in the demand traces.[48]

The competition benefits exercise undertaken in the PACR applies realistic bidding (as outlined in section 7.3). Even though the market model assumes perfect foresight, it considers constraints for the energy limited hydros and pumped hydros including the constraints on upper and lower ponds. The modelling outcomes are consistent with the real market where larger scale pumped hydro tends to generate during renewable scarcity and pump during excess renewable generation time. The competition benefits modelling has shown that the operation of pumped storages under realistic bidding is similar to that with fully competitive bidding.

We can confirm that all historical correlations from the last nine years of measurements of demand at the half hourly or hourly level are carried forward into the future, including coincidence factors.

EnergyAustralia requested EY explain how its market modelling is calibrated to actual outcomes, and how it extrapolates this over the outlook period.[49]

The market modelling is undertaken on an hourly resolution level from July 2021 and this data can be compared with historical data to verify the realism of the model. All the significant factors affecting market dispatch are incorporated, including generation, transmission, bidding. The market rules[50] are carried forward over time, including all the projected ISP data relating to input costs and decisions to build or retire plant on economic grounds.

We consider that the market modelling undertaken adequately mimics what can be expected to occur in the wholesale market, due to the calibration of the market modelling to actual outcomes undertaken by EY. The accompanying market modelling report details how the market model has been calibrated to ensure the results are realistic and in-line with how entities in the wholesale market can be expected to operate.

EnergyAustralia requested we outline the use of EY generation forced outage rates and mean time to repair assumptions and explain how they differ from those used by AEMO in its ISP.[51] EY adopted outage rates for the PADR modelling that differ from those in the ISP on the basis that they represent a more recent and comprehensive data set. The PACR analysis now adopts the AEMO rates.

EnergyAustralia requested that we explain and publish the dynamic loss equations and changes, including discussion on whether there are any material benefits in terms of loss savings.[52]

Loss savings associated with HumeLink are calculated using quadratic loss equations as are used by AEMO to dispatch generation in all regions. Where new lines are added, these loss equations are recalculated and, where additional detail is called for, lines and losses are modelled explicitly, rather than bundled across the transmission corridor.

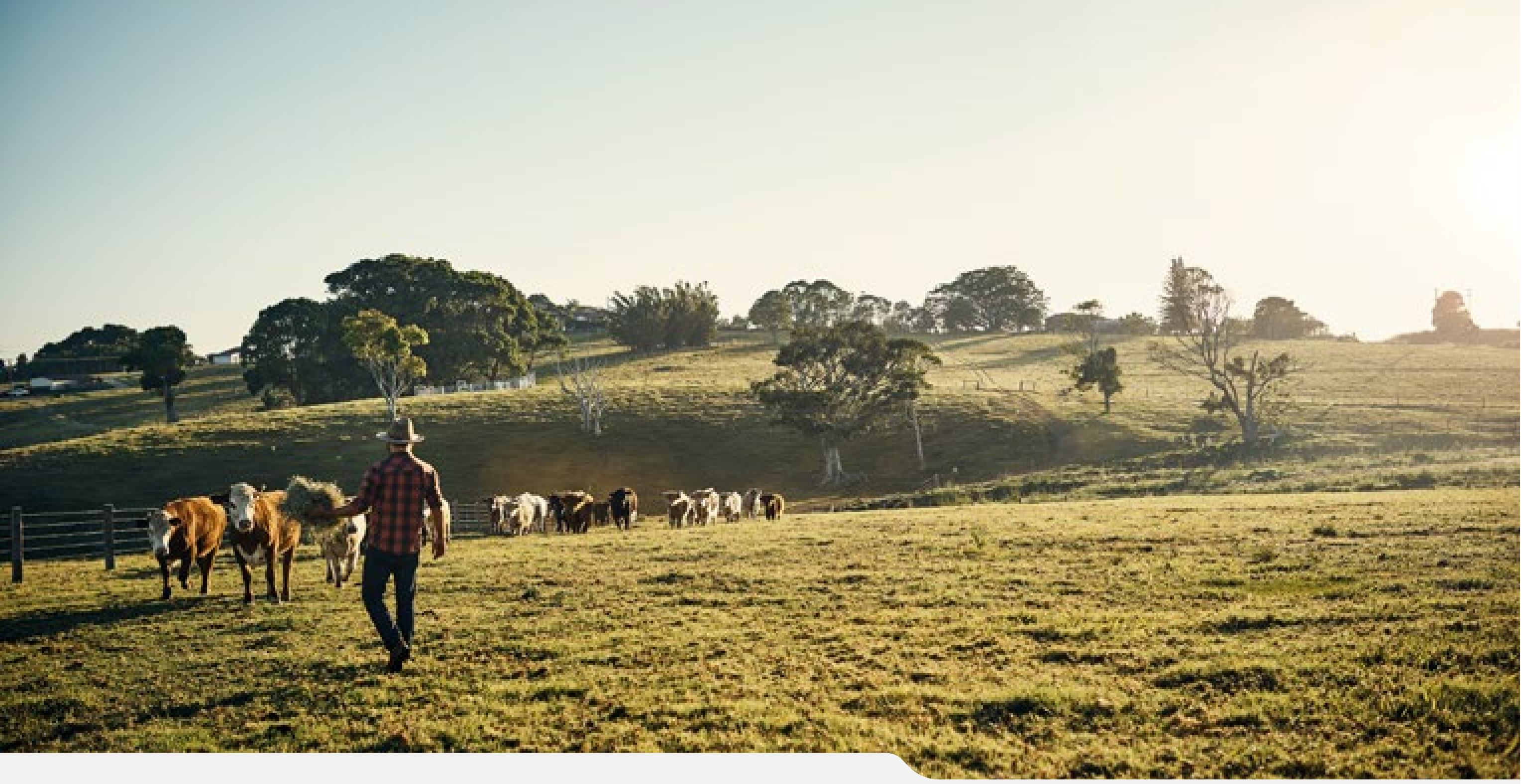
The benefit of changes to network losses is captured within the wholesale market modelling of dispatch cost benefits of avoided fuel costs and changes to voluntary and involuntary load shedding. The reduction in network losses between the base case and the options is material for the options considered and reduces both the energy to be produced by fossil fuel generators to account for the losses, and a reduction in new capacity that has to be built to supply demand, particularly during peak periods.

EnergyAustralia queried whether transient and voltage stability limits are included in the modelling and whether they impact on the transfer capacity modelled in the system technical assessment studies.[53] Similarly, Malcolm Park queried whether there is confidence that the modelling of additional pumping capacity adequately represents the characteristics necessary to fully understand the power system transient stability performance when pumps operate.[54]

We can confirm that both transient and voltage stability limits are included in the modelling. They have been assessed in accordance with industry standards and are taken into account in the transfer capacities of the options.

48. EnergyAustralia, p. 4.
49. EnergyAustralia, p. 4.
50. 'Market rules' refers to all the rules associated with the gross pool market, including generators being dispatched in merit order, free entry and exit of generators from the market (if retirements are permitted), FCAS provided through minimum reserve criteria, unserved energy met by economic trade-off between cost of new entry generation and the cost of unsupplied energy, five region modelling of NEM with bi-directional constraints between regions, all generators meeting costs including capital costs for new generation, energy and storage limits met for energy limited plant etc.
51. EnergyAustralia, p. 4.
52. EnergyAustralia, p. 5.
53. EnergyAustralia, p.
54. Malcolm Park, p. 2.

4. Consultation on the PADR has been incorporated in this analysis (continued)



4.3 MODELLING OUTCOMES

EnergyAustralia requested additional information and analysis on the assumed changes in the supply side, notably in pumped hydro energy storage, and coal-fired installed capacity in order to understand the level of reliance the conclusions have on these assumptions and whether the system will be operationally manageable.[55]

The EY model includes assessment of dispatch of all generation types, including allocation of reserve in each time interval to ensure that there is sufficient dispatchable capacity and that the system will be operationally manageable. All storages have their overall efficiency accounted for and all generation earns at least its marginal cost of supply. All new generation earns at least its variable, fixed and capital costs, by uplifting marginal costs when it is dispatched.

Changes in the supply side, consisting of retirement of coal fired generation at end of life, are compensated by the installation of several other types of generation, including pumped storage and new gas fired generation, which fully replace the energy and capacity of the coal plant, assisted by intermittent renewables which provide capacity to fill pump storages and/or replace the need to operate gas plant, with consequent cost savings.

The model also trades off the cost of a supply shortfall in a given hour against the cost of building additional capacity of any type to cover the shortfall and incorporates a look ahead for the lifetime of the generation to be built to assess whether it is economically justified.

The generation and transmission model is therefore considered to reflect an operationally sound outcome for the NEM, at the lowest cost.

EnergyAustralia stated concern that the central case finds that an additional 11,300 GW of long duration pumped hydro storage, in addition to the capacity provided by Snowy 2.0, is required by 2044/45, and that the lack of utility scale batteries appears to be disconnected from what is happening in the market today and gas-fired generation appears to be missing from the supply mix. EnergyAustralia considered a sensitivity that challenges the presumption of pumped hydro playing a critical role in the transition of the electricity system should be undertaken.[56]

The modelling outcomes reflect the ISP projections for costs of all generation technologies. There are several interchangeable technologies for providing peaking capacity that are operationally identical including pumped hydro, large scale batteries and OCGT, as well as diesel. Should those other technologies be more economic they will be built and replace the equivalent pumped hydro capacity.

The model does not account for batteries to be built to meet fast frequency response or for virtual transmission lines. Such developments are not compatible with the usage of batteries for peak lopping and valley filling duty, which is the main opportunity for arbitrage which leads to investment of battery capacity in the gross pool market.

There is also gas fired generation being developed in the modelled outcomes, since peaking gas capacity and pumped storage and battery capacity are competing technologies for meeting peak demands in the NEM.

A sensitivity that challenges the presumption of pumped hydro playing a critical role in the transition of the electricity system has not been run as it is not expected to be material to the RIT-T assessment. Specifically, if the building of pumped hydro is restricted in the model, it will simply result in alternate, more expensive, technologies being built under both the base case and the option cases. While this is expected to increase the estimated market benefits of the options (since more expensive capacity will be avoided with the options), it is not expected to change their overall ranking.

55. EnergyAustralia, pp. 2-3.
56. EnergyAustralia, p. 3.

4. Consultation on the PADR has been incorporated in this analysis (continued)

EnergyAustralia requested that we publish details of the sensitivity studies around closure of coal plant based on economic viability to be summarised and published, including the details on the closure criteria applied.[57] This material has been published with this PACR and the accompanying market modelling report.

EnergyAustralia raised three specific questions in relation to system security and strength going forward:[58]

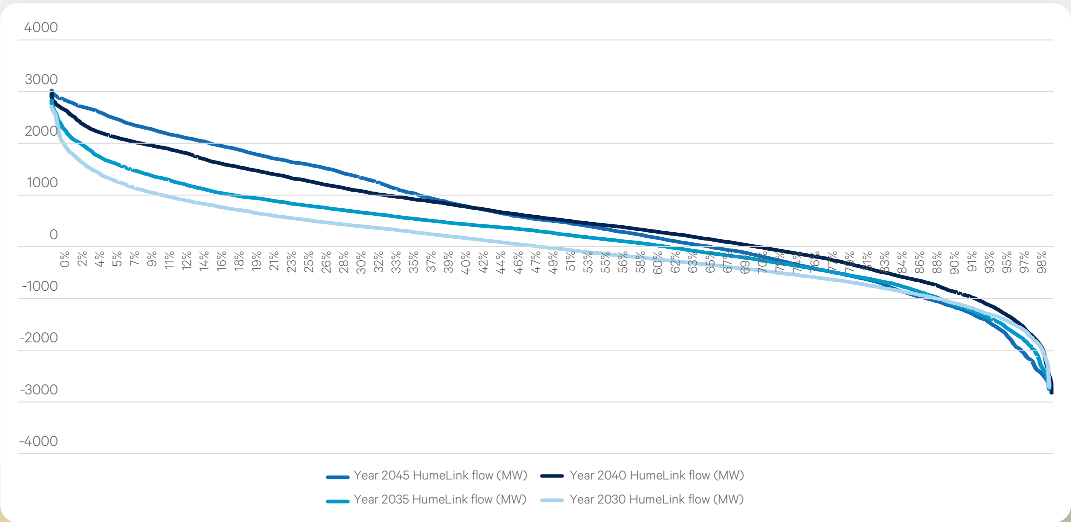
1. How dependent is power system operation, or maintaining the reliability standard, on the levels of pumped hydro from the long-term planning and, if the forecast capacity of pumped hydro does not arrive, does the system face significant security and reliability challenges?
2. Will system strength, low inertia or frequency/voltage control issues prevail that have not been considered in the study?
3. Will the remaining dispatchable coal plants be able to ramp up and down to efficiently support the swings in intermittent generation from new capacity built as a result of the new interconnector?

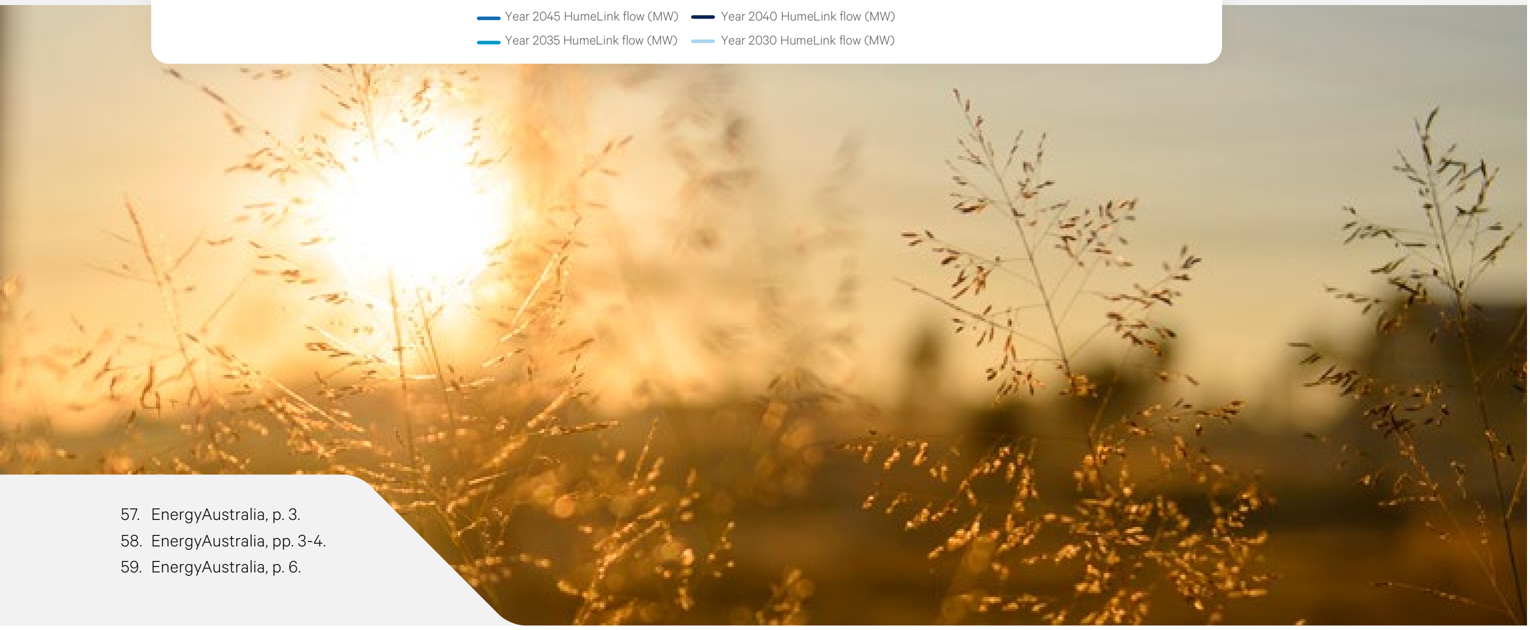
With respect to each of the three questions:

1. The forecast is a market development forecast and ensures an allocation of reserve in each time interval to ensure that there is sufficient dispatchable capacity and that the system will be operationally manageable. If pumped storage is not built in sufficient capacity, or not operated at the level that has been predicted by the model, then it is anticipated that the market will provide additional peaking capacity of a different type, particularly peaking gas or batteries.
2. These factors have not been explicitly modelled as constraint equations in the model. Instead reserve against a single contingency with full restoration of security following the contingency is incorporated as a constraint to reflect market rules relating to LOR1, LOR2 and LOR3 conditions. The reserve carried is expected to contribute significantly to meeting the requirements listed.
3. Remaining coal plants are able to ramp to efficiently meet the swings in intermittent generation as evidenced by review of hourly dispatch. Specific testing of existing ramp rate settings by generators in the market has been undertaken and does not change the NPV of the market benefits, as the preferred option and the 'do nothing' case are slightly impacted by binding ramp rates for a small proportion of the time. The generators will be incentivised by the market to expand ramp rates to alleviate any constraints that could emerge.

EnergyAustralia requested that the utilisation of HumeLink (per cent of transfer capacity) is published, including intraday flows and duration curves.[59] The figure below presents the duration curves for forecast Humelink flow for 2030, 2035, 2040 and 2045.

Figure 3 – Load duration curve for HumeLink flow to supply load centres (Maragle – Bannaby and Wagga Wagga – Bannaby)





57. EnergyAustralia, p. 3.
58. EnergyAustralia, pp. 3-4.
59. EnergyAustralia, p. 6.

4. Consultation on the PADR has been incorporated in this analysis (continued)

4.4 COST OF THE OPTIONS

EnergyAustralia queried whether the network project costs include easements and land acquisition allowances and what needs to be done to refine 'midpoint' costs for the purposes of the PACR.[60] ERM Power recommended that in finalising this RIT-T process the costings be subject to potential variation not greater than +/- 15 per cent.[61]

Significant effort has gone into refining the cost estimates for the credible options as part of this PACR (as outlined in section 2.2.3). A key component of the updated costs is updated easement/land acquisition costs as well as biodiversity offset costs.

We consider our cost estimates to be 'class 4' estimates, which is in-line with the level of accuracy expected at this stage of the investment process. For example, AEMO commented during the consultation process on its transmission cost database that the cost certainty at the PACR stage is typically between -30 per cent and +50 per cent ('class 4' estimates) or -20 per cent and +30 per cent ('class 3' estimates).[62] We do not consider that it is either necessary or feasible for the cost estimates to be +/- 15 per cent as suggested by ERM Power. Substantive further work will be necessary to further refine the current cost estimate.

We consider that the capital costs used in the PACR analysis are 'P50' estimates, i.e., they have a 50 per cent expected probability of cost underrun. For completeness, we have also considered alternate 'P90' capex estimates as a sensitivity (see section 8.4.5), which are higher than the P50 estimates and allow for additional contingencies (the P90 capex estimates have an expected 90 per cent probability of cost underrun).

Activities not related to the RIT-T but necessary to progress assessment of the project in order to achieve approval are being progressed, including the Environmental Impact Statement process. Following clarification from the AER over September and October 2020,[63] we are intending to submit two contingent project applications (CPAs) to the AER in relation to the regulatory cost recovery for the project, namely:

- 'Initial CPA' – will seek cost recovery for works to-date and the cost of the works necessary to develop a robust cost estimate for the project, based on the preferred option; and
- 'Final CPA' – will seek cost recovery for the implementation costs, including construction cost of the project, once a final estimate is available (this CPA will cover the bulk of the project cost).

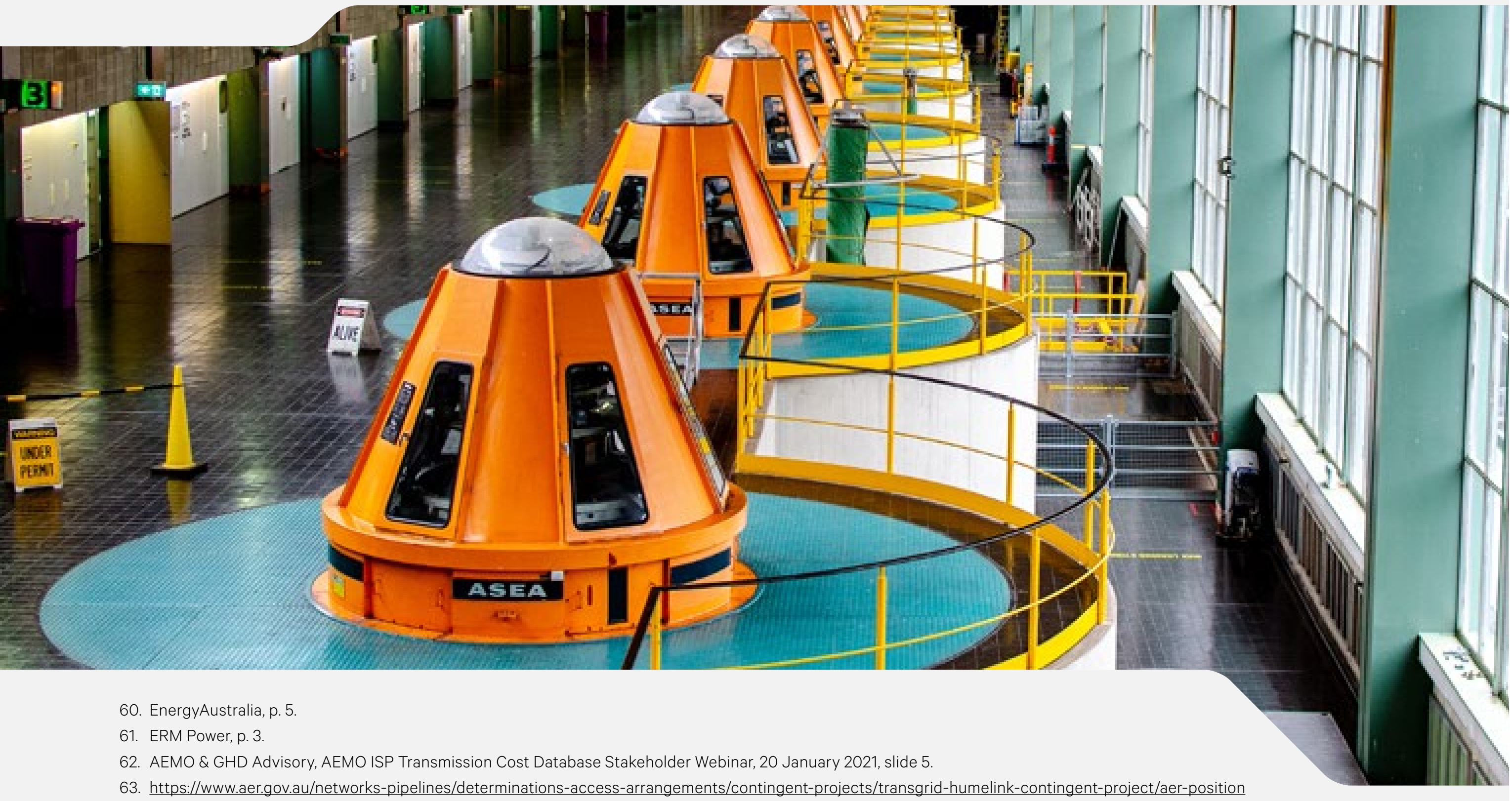
As part of the contingent project processes, we will seek a 'feedback loop' confirmation from AEMO in-line with the new actionable ISP framework if the costs of the preferred option exceed those currently estimated in the RIT-T assessment. This will ensure that the investment is confirmed as being consistent with the optimal development path in the ISP, where costs have increased.

EnergyAustralia requested confirmation that the transmission asset economic lives used and the one per cent of capex per annum opex assumption are consistent with AER views when approving expenditure allowances.[64]

The economic NPV model released with the PADR states the asset lives used in the RIT-T assessment, which are 40 years for substation equipment and 50 years for transmission lines. These are consistent with our current revenue determination made by the AER (please refer to the 'PTRM input' tab of our current Post Tax Revenue Model[65]).

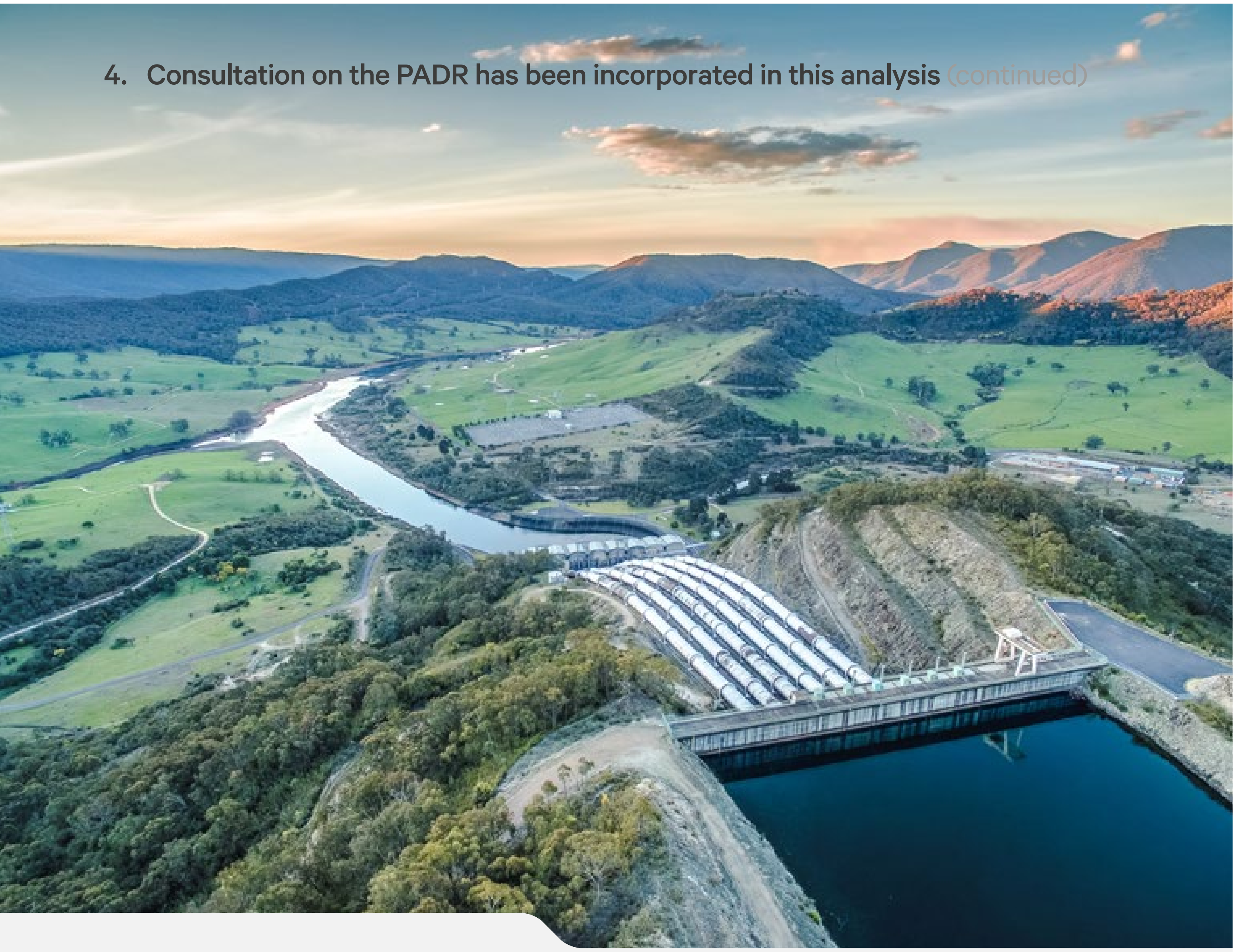
We have also refined the assumption regarding annual operating costs based on more detail cost assessment. We now assume this to be 0.5 per cent of each option's capital costs each year (excluding capital costs relating to biodiversity costs since these are one-off and do not require ongoing operating costs).

EnergyAustralia requested that the cumulative transmission capex/opex on annual profile charts be published (Figures 5, 10, 15 and 20 in the PADR).[66] This material has been published with this PACR.



60. EnergyAustralia, p. 5.
61. ERM Power, p. 3.
62. AEMO & GHD Advisory, AEMO ISP Transmission Cost Database Stakeholder Webinar, 20 January 2021, slide 5.
63. https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/contingent-projects/transgrid-humelink-contingent-project/aer-position
64. EnergyAustralia, p. 5.
65. Available from https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/transgrid-determination-2018-23
66. EnergyAustralia, p. 5.

4. Consultation on the PADR has been incorporated in this analysis (continued)



4.5 THE INCIDENCE OF MARKET BENEFITS

PIAC recommended that TransGrid determine the share of benefits from the investment that accrue to Snowy 2.0 and those that accrue to consumers. Specifically, PIAC suggests we should identify any imbalance of costs and benefits for NSW consumers and examine options to address this, including Snowy 2.0 being required to directly fund a commensurate portion of the investment, as part of the HumeLink RIT-T.[67]

Similarly, ERM Power recommend that we also consult on and conduct modelling with regards to the changes in consumers and supplier benefits as part of this RIT-T process.[68]

EnergyAustralia requested that the regional benefits, relative to regional costs, are published, particularly for NSW, South Australia and Victoria.[69] EnergyAustralia also requested that the modelled price outcomes are published, including duration curves and intraday price shape.[70]

We note that the RIT-T identifies where transmission investment is expected to provide an overall net benefit to the market as a whole. That is, investments as a result of which customers across the NEM will benefit in the long-run by more than the cost of the investment incurred. Cost allocation, and the sharing of risk as between different stakeholders in the energy market and the extent to which a market benefit serves to the greater advantage of one party than the other is a public benefits assessment that is separate to the market benefit analysis of the RIT-T processes. Accordingly, PIAC's concerns, echoed by ERM Power and EnergyAustralia are considerations that are not within the purview of a RIT-T process and instead is the subject matter for consultation and engagement by governments and regulators in broader market reform and regulatory processes.

The purpose of the RIT-T and this PACR is to identify through cost benefit analysis classes of market benefits that are identified in clause 5.15A.2(b)(4) of the NER and accordingly the accompanying market modelling report to this PACR provides detail on where the relative costs and benefits are expected to accrue in the NEM. Specifically, this report outlines the regions and technologies expected to be affected with each of the options in-place under each scenario, compared to the base case.

The market benefits are expected to be passed through to customers in the long run. The modelling of specific customer impacts has been considered by policymakers in the past to be too reliant on assumptions made about pricing to be workable.

67. PIAC, p. 3.
68. ERM Power, p. 2.
69. EnergyAustralia, p. 5.
70. EnergyAustralia, p. 5.

4. Consultation on the PADR has been incorporated in this analysis (continued)

4.6 DIVERSITY BENEFITS FROM AN ELECTRICAL 'LOOP'

EnergyAustralia requested clarification of the expected costs (and cost inputs) associated with our estimate in the PADR of a simultaneous failure of both circuits of an interconnector.[71]

The costs associated with such 'high impact low probability' events are subject to a number of variables, including line loading at the time of the event, power system conditions, availability of alternative generation, duration of the outage, etc. Depending on the severity of the event, the cost impact can range from a few million dollars to hundreds of millions.

By way of comparison, an example of such an event was the double-circuit trip of the QNI in August 2018 due to a lightning strike with no prior warning of storm activity in the area. In this event, Queensland and South Australia both separated from the other states in the NEM and 1,078 MW of load was shed. Load was restored between 20 minutes and 2½ hours after the event. Using the AER VCR estimates for NSW and Queensland, this lost load is valued at approximately $25 million.

The calculation EnergyAustralia refer to was undertaken in the PADR to provide a high-level estimate of the consequence if a 'high impact low probability' event affects two lines simultaneously to provide context for why Option 3C is expected to be inherently less risky, since its lines are further apart and so less likely to both go down at the same time, than Option 2C. It was intended only to be indicative and was labelled as such in the PADR.

We note that the PACR now finds that Option 3C is more strongly preferred over Option 2C than it was at the PADR stage for numerous reasons, including it now having significantly lower costs than Option 2C and greater estimated competition benefits. We therefore do not consider this calculation to be material to identifying the top-ranked option. We have therefore not updated, or repeated, it in the PACR.

4.7 USE OF DOUBLE-CIRCUIT VERSUS SINGLE-CIRCUIT

Malcolm Park suggested that the need for two new single-circuit lines in sections where one double-circuit line could be enough is reviewed.[72]

As part of this PACR, we have investigated different circuit configurations of the top performing network topologies and operating capacities in the PADR and PACR analysis (i.e., 'Option 2C' and 'Option 3C'). Specifically, we have investigated:

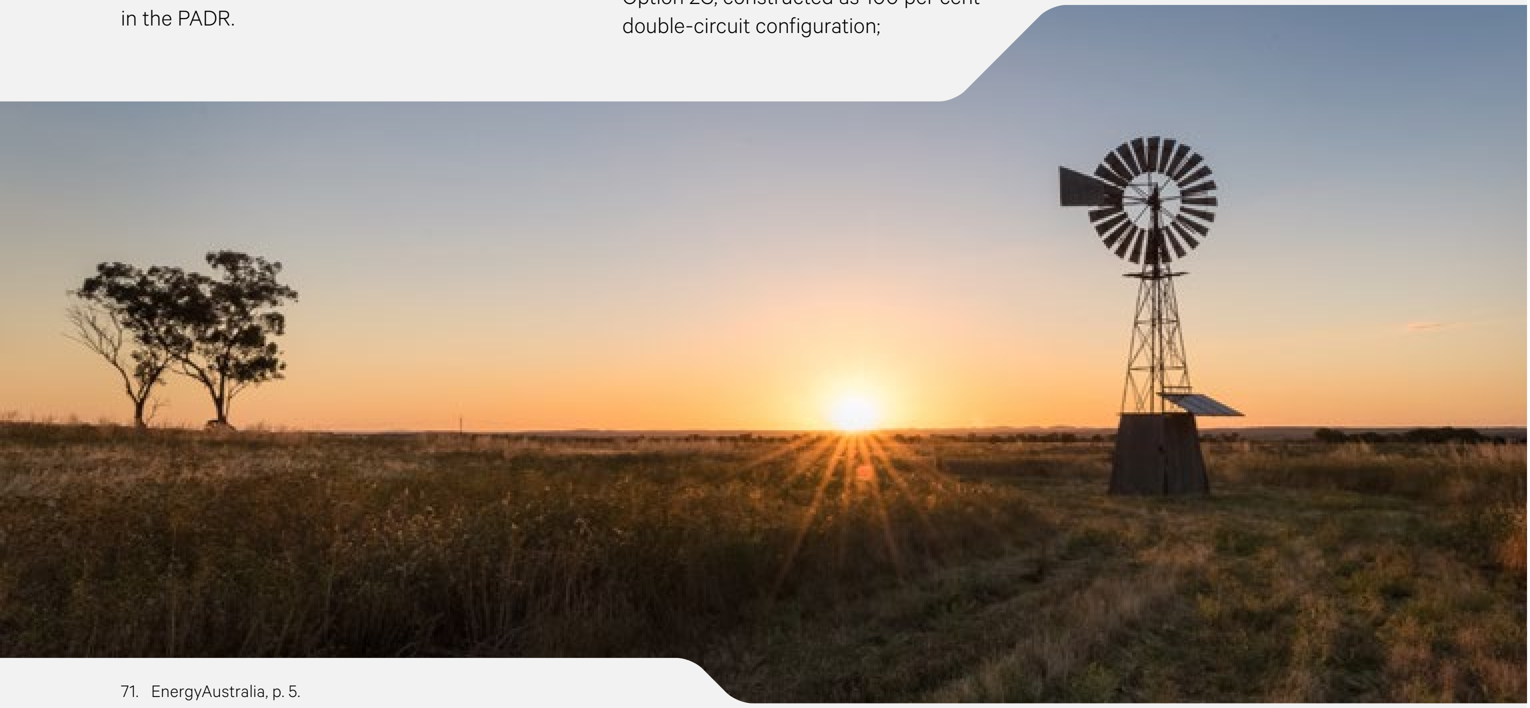
- three variants of the preferred network topology and operating capacity in the PADR and PACR analysis, i.e., Option 3C:
  - Option 3C, constructed as 100 per cent double-circuit configuration;
  - Option 3C-0, constructed as a 100 per cent single-circuit configuration; and
  - Option 3C-1, constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby;
- two variants of the second-ranked network topology and operating capacity in the PADR and PACR analysis, i.e., Option 2C:
  - Option 2C, constructed as 100 per cent double-circuit configuration;
  - Option 2C-1, constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby.

Each variant for the two network topologies is electrically the same and so delivers the same expected gross benefits.

All variants involving double-circuit portions of transmission line (i.e., 2C, 2C-1, 3C and 3C-1) have been assessed to investigate lower cost variants of the top performing network topologies and operating capacity. Specifically, the use of double-circuits for portions of these lines reduces the associated land and environmental offset costs compared to two separate single-circuit portions.

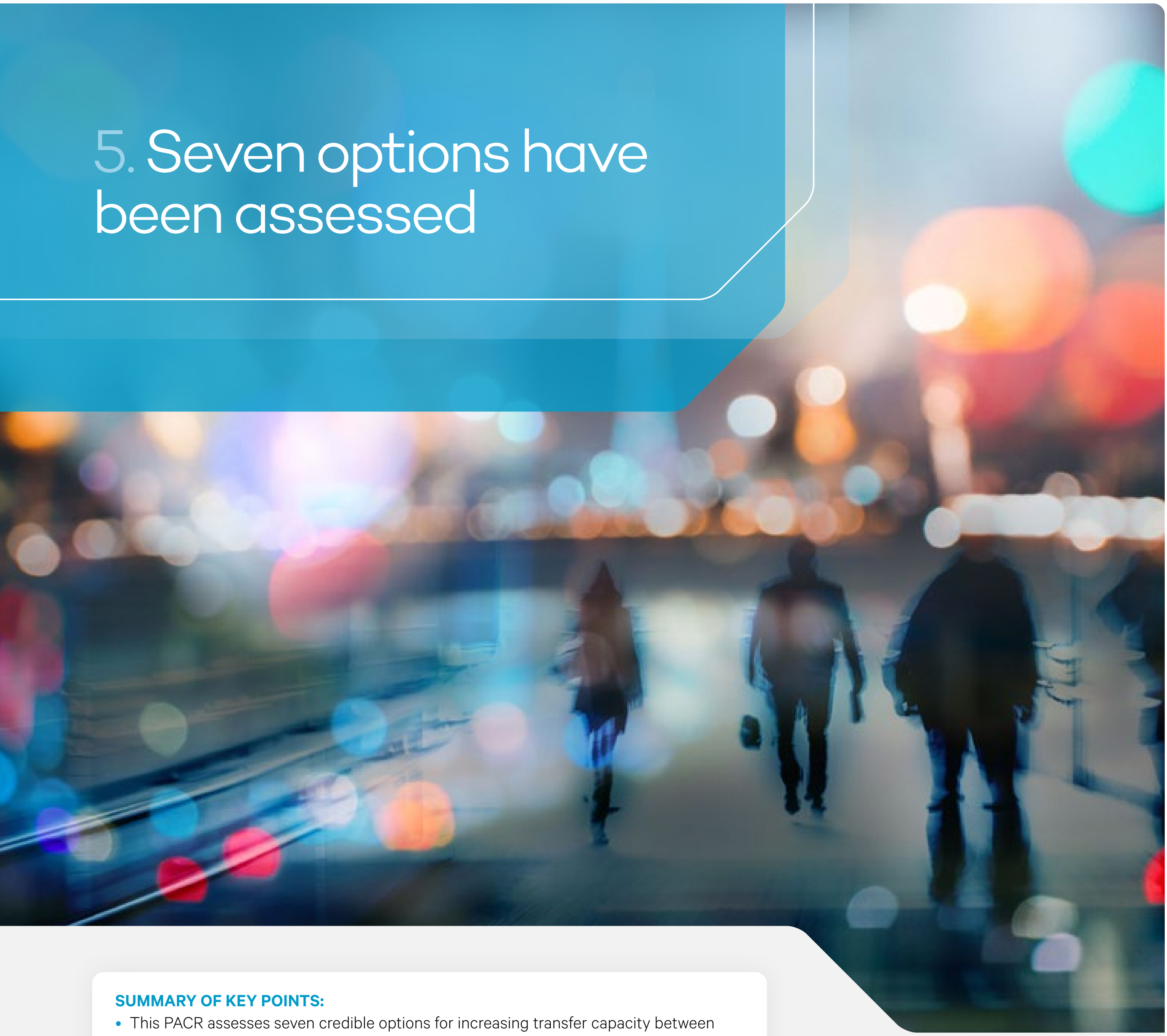
The outworking of these studies is that Option 2C and Option 3C from the PADR are presented in the PACR as complete double-circuit options, which allows significant cost reductions relative to where they are constructed as either a single-circuit, or a combination of single- and double-circuit, configuration.[73] The additional work undertaken since the PADR assessing the risks involved with double-circuit configuration, compared to single-circuit, and how these risks can be mitigated, has enabled these two options to be put forward as double-circuit configurations as part of this PACR.

Appendix B.1.2 provides additional detail on the consideration of these alternate line configurations and the risk assessment undertaken.



71. EnergyAustralia, p. 5.
72. Malcolm Park, p. 1.
73. In addition, while the other options are primarily single-circuit, they all now involve a 132 km double-circuit component west of Bannaby, an area we where we consider bushfire risk is a more manageable risk, in order to reduce costs. We have not investigated complete double-circuit versions of these options, as we have for Option 2C and Option 3C, as any cost reductions are not expected to result in these options becoming top ranked options given their significantly lower net benefits than for Option 2C and Option 3C.

5. Seven options have been assessed



SUMMARY OF KEY POINTS:

- This PACR assesses seven credible options for increasing transfer capacity between southern NSW and Sydney, Newcastle and Wollongong, reflecting three alternative network topologies and two different operating capacities.
- Seven of the twelve options from the PADR continue to be assessed, reflecting the same three operating capacities.
- The three options from the PADR that follow 'topology 4' (involving new transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby and direct between Bannaby and Sydney) have not been assessed further. These options have significantly greater revised costs than the other options and are not expected to provide commensurately greater market benefits at this point in time.
- The PACR does not assess Option 2A or Option 3A from the PADR (the two fixed 330 kV versions of these network topologies) since they were found to have significantly lower benefits than the others and, in particular, Option 3C in the PADR assessment.
- The costs of the options have been refined since the PADR. These costs reflect our current best estimates of the costs involved with each of the options at this point in time.
- Once the RIT-T process is complete, we intend to submit an initial CPA for HumeLink to seek cost recovery for works necessary to develop a robust final cost estimate for the project. If this final cost estimate is materially higher, then AEMO will need to confirm that the project remains consistent with the ISP optimal development path at the higher cost (as part of the 'feedback loop') before the project can proceed further.

This PACR assesses seven different network options to provide additional transfer capacity on the NSW Southern Shared Network between the Snowy Mountains and the major load centres of Sydney, Newcastle and Wollongong.

Based on the NPV assessment in the PADR and further detailed screening of the options considered, the list of credible options has been refined to ensure that the top-ranked options are able to be assessed at a greater level of detail as part of the PACR.

The analysis now focuses on seven options that are expected to have the greatest net market benefits overall. Specifically, this PACR assesses the options across the following three different topologies:

1. Topology 1 – a 'direct' path between Maragle and Bannaby:
   - Option 1A, Option 1B and Option 1C from the PADR

5. Seven options have been assessed (continued)

2. Topology 2 – a path between Maragle and Bannaby via Wagga Wagga that would open up additional capacity for new renewable generation in southern NSW:
   - Option 2B and Option 2C from the PADR
3. Topology 3 – a wider footprint via Wagga Wagga, that would open up both direct and additional capacity for new renewable generation in southern NSW:
   - Option 3B and Option 3C from the PADR

The PACR does not assess the 'Topology 4' options from the PADR (involving new transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby and direct between Bannaby and Sydney). These options have significantly greater revised costs than the other options (in the order of $4.7 billion to $5 billion) and are not expected to provide commensurately greater market benefits than their counterparts following the three topologies outlined above. Any assessment of increasing the transmission capacity between Bannaby and Sydney may form part of a future RIT-T.

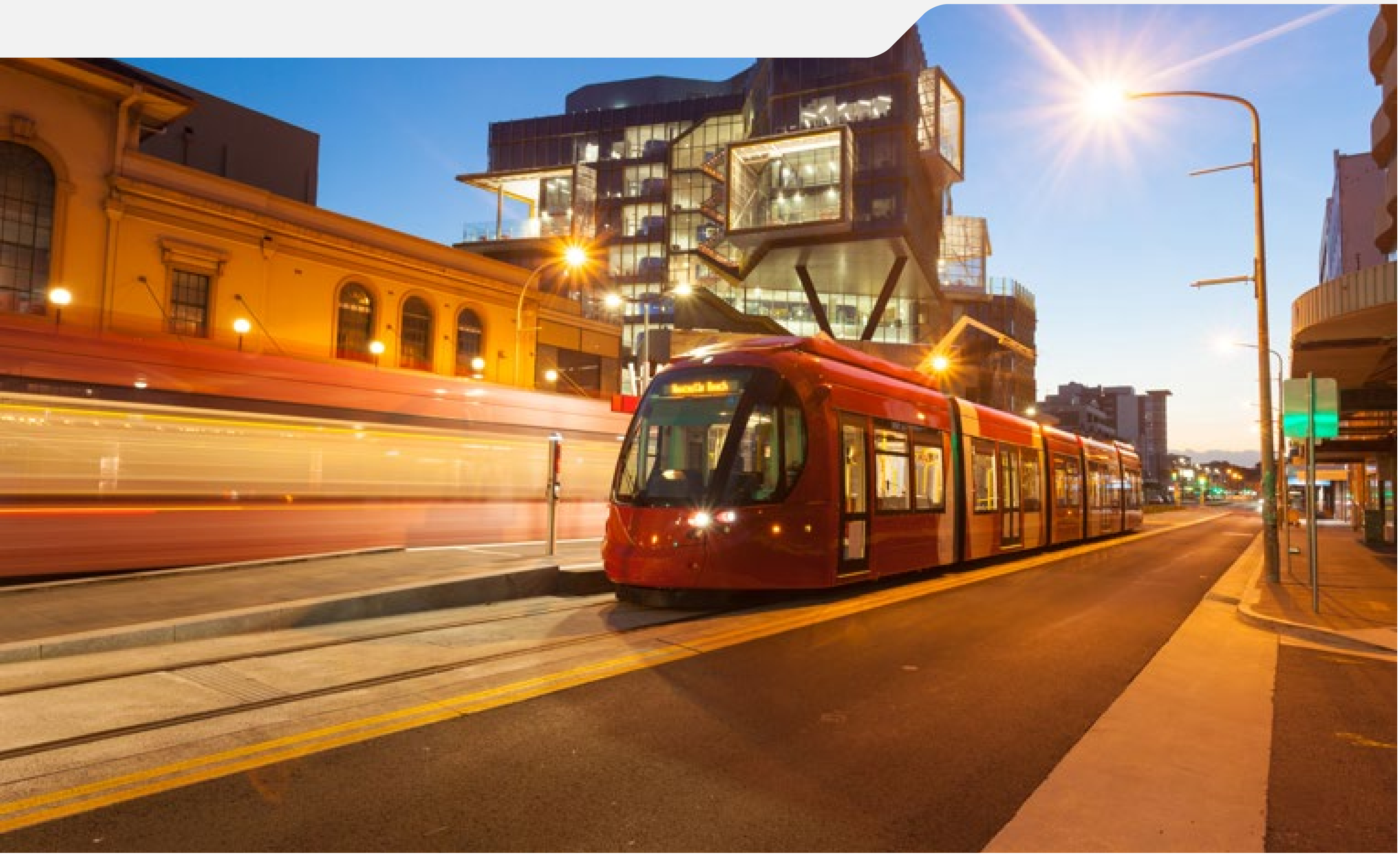
The PACR also does not assess Option 2A or Option 3A from the PADR (the two 330 kV build and operate options of these network topologies) since they were found to have significantly lower benefits than the other options and, in particular, Option 3C in the PADR assessment. Specifically, these options were found to have net benefits that were 38 and 36 per cent lower than Option 3C on a weighted basis in the PADR.

We have investigated different circuit configurations of the top performing network topologies and operating capacities in the PADR and PACR analysis (i.e., 'Option 2C' and 'Option 3C'). The outworking of this process is that Option 2C and Option 3C from the PADR are presented in the PACR as complete double-circuit options, which allows significant cost reductions relative to where they are constructed as either a single-circuit, or a combination of single- and double-circuit, configuration.[74] Additional work undertaken since the PADR assessing the risks involved with double-circuit configurations, compared to single-circuit, and how these risks can be mitigated has enabled these two options to be refined as part of this PACR.

Each of the network options for topologies 1, 2 and 3 are summarised in Table 5-1, Table 5-2 and Table 5-3 below, respectively.[75] Each of these tables shows the additional network capacity that each provides between southern NSW and the major load centres of Sydney, Newcastle and Wollongong.[76, 77] All costs are presented in 2020/21 dollars.

All diagrams are high-level schematic illustrations only and specific line routes are not defined within the PACR. Moreover, all quoted line lengths in this section are only indicative and, for the preferred option, are subject to change once the more detailed route selection and line alignment is undertaken.

74. In addition, while the other options are primarily single-circuit, they all now involve a 132 km double-circuit component west of Bannaby, an area we where we consider bushfire risk is a more manageable risk, in order to reduce costs. We have not investigated complete double-circuit versions of these options, as we have for Option 2C and Option 3C, as any cost reductions are not expected to result in these options becoming top ranked options given their significantly lower net benefits than for Option 2C and Option 3C.
75. Please note that the biodiversity offset costs shown in the tables below for Option 2C and Option 3C are lower than for Option 1C due to their full double circuit arrangement, while Option 1C involves two single circuit lines to be constructed in parallel (with a 132 km of double circuit lines) that translates to a larger easement width footprint. Similarly, Option 2C and Option 3C have lower biodiversity costs than Option 2B and Option 3B, respectively, since these 'B' options assume two single circuit lines (with the exception of the 132 km double circuit section).
76. While the indicative additional firm capacities in this table assume an average level of import from VIC to NSW of 200 MW and average wind generation in southern NSW of 265 MW and zero SA-NSW imports, the market modelling dynamically models both of these key sources of supply for NSW.
77. Note that all costs in these tables have been rounded to the nearest $5 million for presentational purposes. The accompanying NPV results spreadsheets have the full cost estimates in them.



5. Seven options have been assessed (continued)

Table 5-1 Summary of the 'topology 1' credible options assessed in this PACR

TOPOLOGY/OPERATING CAPACITY	A. FIXED 330 KV	B. FLEXIBLE 500 KV	C. FIXED 500 KV
1 Two new transmission lines between Maragle and Bannaby	**OPTION 1A** Two new 330 kV high capacity transmission lines, switchgear and phase shifting transformer	**OPTION 1B** Two new 500 kV transmission lines operated at 330 kV, switchgear and phase shifting transformer	**OPTION 1C** Two new 500 kV transmission lines, tie transformers and switchgear
	Additional firm capacity 2,050 MW	**Additional firm capacity** 2,170 MW initially 2,570 MW if upgraded to 500 kV	**Additional firm capacity** 2,510 MW
	Indicative capex Lines and substations: $1,470m Biodiversity offset cost: $1,060m Total capex: $2,530m	**Indicative capex** Lines and substations: $1,990m Biodiversity offset cost: $1,320m Total capex: $3,310m	**Indicative capex** Lines and substations: $1,725m Biodiversity offset cost: $1,340m Total capex: $3,065m

Note: Lines represent circuits only and are not intended to represent transmission line routes.

Table 5-2 Summary of the 'topology 2' credible options assessed in this PACR

TOPOLOGY/OPERATING CAPACITY	B. FLEXIBLE 500 KV	C. FIXED 500 KV
2 New transmission lines between Maragle, Wagga Wagga and Bannaby	**OPTION 2B** Four new 500 kV transmission lines operated at 330 kV, switchgear and phase shifting transformers	**OPTION 2C** Four new 500 kV transmission lines, tie transformers and switchgear
	Additional firm capacity 2,000 MW initially 2,500 MW if upgraded to 500 kV	**Additional firm capacity** 2,510 MW
	Indicative capex Lines and substations: $3,150m Biodiversity offset cost: $1,150m Total capex: $4,300m	**Indicative capex** Lines and substations: $2,585m Biodiversity offset cost: $815m Total capex: $3,400m

Note: Lines represent circuits only and are not intended to represent transmission line routes.

Table 5-3 Summary of the 'topology 3' credible options assessed in this PACR

TOPOLOGY/OPERATING CAPACITY	B. FLEXIBLE 500 KV	C. FIXED 500 KV
3 New transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby	**OPTION 3B** Three new 500 kV transmission lines operated at 330 kV, switchgear and phase shifting transformer	**OPTION 3C** Three new 500 kV transmission lines, tie transformers and switchgear
	Additional firm capacity 2,030 MW initially 2,570 MW if upgraded to 500 kV	**Additional firm capacity** 2,570 MW
	Indicative capex Lines and substations: $2,560m Biodiversity offset cost: $1,220m Total capex: $3,780m	**Indicative capex** Lines and substations: $2,380m Biodiversity offset cost: $935m Total capex: $3,317m

Note: Lines represent circuits only and are not intended to represent transmission line routes.

5. Seven options have been assessed (continued)

All options are assumed to have annual operating costs equal to approximately 0.5 per cent of their capital costs. This assumption has been refined since the PADR as part of the wider cost refinement (as outlined in section 2.2.3).

Construction for all options is expected to take 2-3 years, with commissioning in 2026/27, subject to obtaining necessary environmental and development approvals. The future upgrades associated with the flexible 500 kV options are expected to take two years and the timing differs by scenario (as summarised in section 7.1.7).

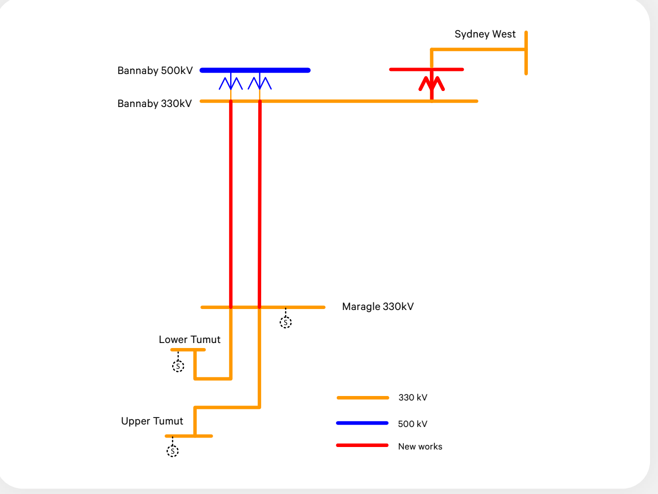
The remainder of this section provides further detail on each of these options. Appendix B outlines the network options that have been considered but not progressed over the course of this RIT-T (together with the reasons why).

Final decisions regarding route diversity for the preferred option will be based on an assessment of network risks and mitigation strategies, having regard to the relative cost of diversity options, that sits outside of the RIT-T process (specifically, the EIS process summarised in the introduction).

5.1 TWO NEW LINES BETWEEN MARAGLE AND BANNABY

5.1.1 Option 1A – Two new 330 kV lines from Maragle to Bannaby using high capacity conductor

This option involves constructing two new 330 kV lines from Maragle to Bannaby using a high capacity conductor and a phase shifting transformer on Bannaby – Sydney West 330 kV line to control power flows on existing transmission lines between Bannaby and Sydney.



The high level scope includes:

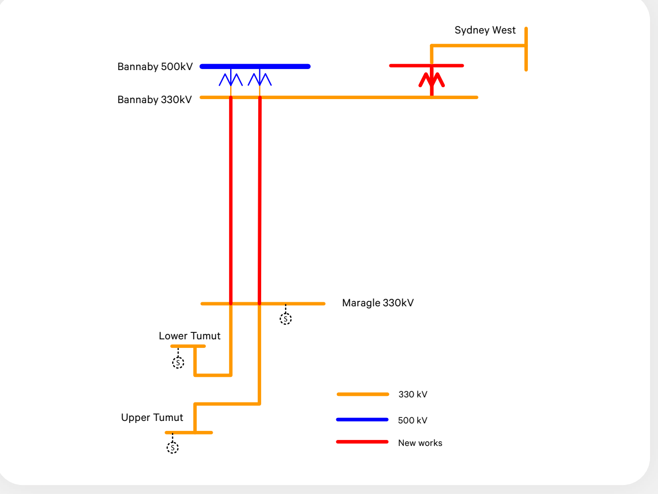
- Constructing two 330 kV transmission lines using high capacity conductor:
  - Between Maragle 330 kV switching station and Bannaby 330 kV substation
- Phase shifting transformers on Bannaby-Sydney West 330 kV line
- Augment the Maragle switching station to accommodate the additional transmission lines
- Augment the existing Bannaby substation to accommodate the additional transmission lines and phase shifting transformers

Preliminary modelling indicates that an additional 2,050 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

The estimated capital cost of this option is approximately $2,529 million.

5.1.2 Option 1B – Two new 500 kV lines initially operated at 330 kV between Maragle and Bannaby

This option involves constructing two new 500 kV lines initially operated at 330 kV between Maragle and Bannaby and a phase shifting transformer on Bannaby – Sydney West 330 kV line.



The high level scope includes:

- Construct two 500 kV transmission lines to be initially operated at 330 kV:
  - Between Maragle 330kV switching station and Bannaby 330 kV substation
- Phase shifting transformers on Bannaby-Sydney West 330 kV line
- Augment the Maragle switching station to accommodate the additional transmission lines
- Augment the existing Bannaby substation to accommodate the additional transmission lines and phase shifting transformers

Preliminary modelling indicates that additional 2,170 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

The estimated initial capital cost of this option is approximately $3,311 million. There would be additional costs associated with upgrading from 330 kV to 500 kV as well but these have not been estimated as part of this PACR.[78]

78. The 330 kV to 500 kV upgrade costs were not estimated as part of the PACR assessment as an initial assumption to investigate how these options fared relative to the other options before resources were dedicated to estimating the upgrade costs. Since the flexible options are found to always be inferior to the fixed 500 kV options, we have not estimated the upgrade costs as part of this PACR. We consider this a proportionate approach to considering these options.

5. Seven options have been assessed (continued)

5.1.3 Option 1C – Two new 500 kV lines between Maragle and Bannaby

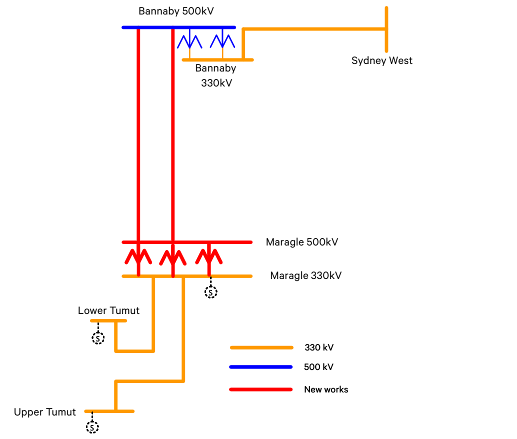
This option involves constructing two new 500 kV lines between Maragle and Bannaby.

The high level scope includes

- Construct two 500 kV transmission lines:
  - Between Maragle substation and Bannaby 500 kV substation
- Three new 500/330/33 kV 1,500 MVA transformers at Maragle substation
- Augment the Maragle substation to accommodate the additional transmission lines
- Augment the existing Bannaby substation to accommodate the additional transmission lines

Preliminary modelling indicates that additional 2,510 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

The estimated capital cost of this option is approximately $3,066 million.



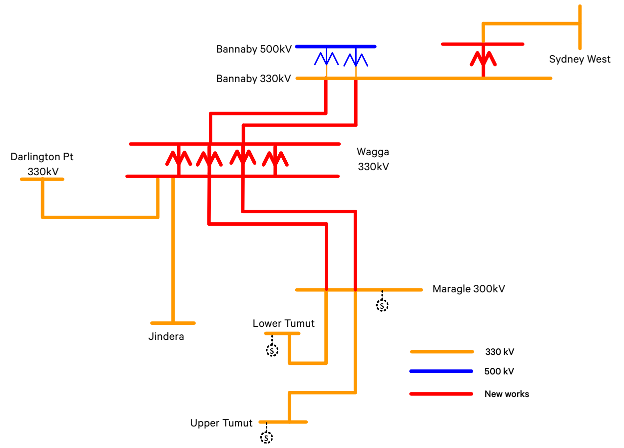
5.2 NEW LINES BETWEEN MARAGLE, WAGGA WAGGA AND BANNABY

5.2.1 Option 2B – New 500 kV lines initially operated at 330 kV between Maragle, Wagga Wagga and Bannaby

This option involves constructing new 500 kV lines initially operated at 330 kV between Maragle and Bannaby via Wagga Wagga and a phase shifting transformer on Bannaby – Sydney West 330 kV line.

The high level scope includes:

- Construct four 500 kV transmission lines to be initially operated at 330 kV:
  - Two lines between Maragle 330 kV switching station and Wagga Wagga 330 kV switching station; and
  - Two lines between Wagga Wagga 330 kV switching station and Bannaby 330 kV substation
- Phase shifting transformers on Bannaby-Sydney West 330 kV line
- Phase shifting transformers on Wagga Wagga–Bannaby 330 kV lines
- New Wagga Wagga 330 kV switching station
- Augment the Maragle switching station to accommodate the additional transmission lines
- Augment the existing substations at Wagga Wagga and Bannaby to accommodate the additional transmission lines



Preliminary modelling indicates that an additional 2,000 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

The initial estimated capital cost of this option is approximately $4,302 million. There would be additional costs associated with upgrading from 330 kV to 500 kV as well but these have not been estimated as part of this PACR.[79]

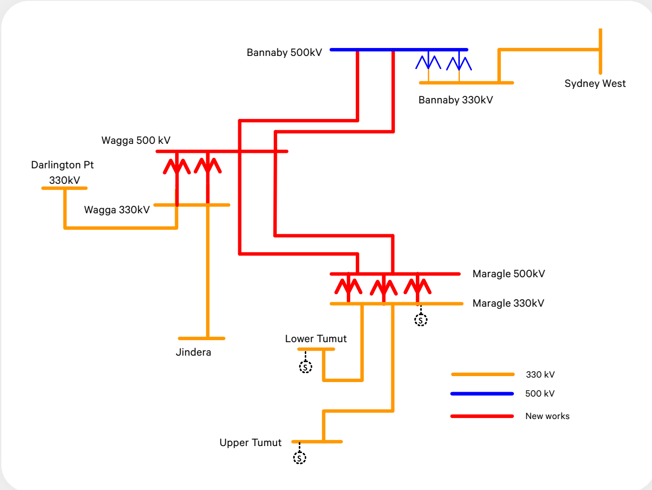
Option 2B is more expensive than its 500 kV counterpart (Option 2C) on account of the phase shifting transformers required to accommodate 2,000 MW of new generation at 330 kV (which are redundant at 500 kV).

79. The 330 kV to 500 kV upgrade costs were not estimated as part of the PACR assessment as an initial assumption to investigate how these options fared relative to the other options before resources were dedicated to estimating the upgrade costs. Since the flexible options are found to always be inferior to the fixed 500 kV options, we have not estimated the upgrade costs as part of this PACR. We consider this a proportionate approach to considering these options.

5. Seven options have been assessed (continued)

5.2.2 Option 2C – New 500 kV double-circuit lines between Maragle, Wagga Wagga and Bannaby

This option involves constructing new 500 kV lines between Maragle, Wagga Wagga and Bannaby.



The high level scope includes:

- New Wagga Wagga 500/330 kV substation and double circuit 330 kV connection to the existing Wagga Wagga substation
- Construct four 500 kV transmission lines:
  - Two lines between Maragle substation and Wagga Wagga 500 kV substation; and
  - Two lines between Wagga Wagga substation and Bannaby 500 kV substation
- Three new 500/330/33 kV 1,500 MVA transformers at Maragle substation and two new 500/330/33 kV 1,500 MVA transformers at Wagga Wagga substation
- Augment the Maragle substation to accommodate the additional transmission lines
- Augment the existing substations at Wagga Wagga and Bannaby to accommodate the additional transmission lines

Preliminary modelling indicates that an additional 2,500 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

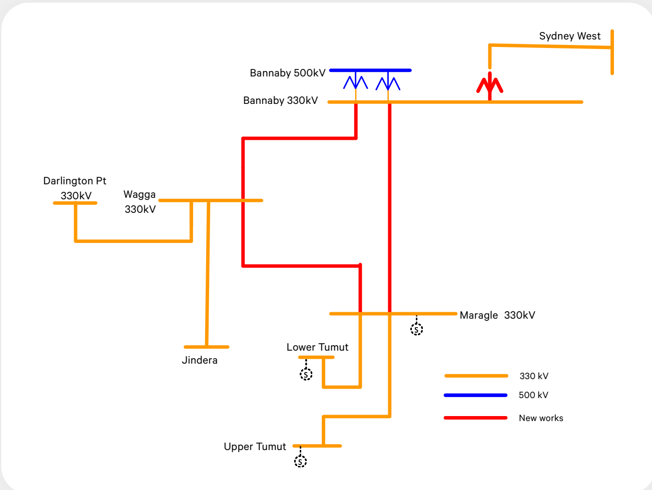
The estimated capital cost of this option is approximately $3,399 million.

As part of the PACR analysis, we have investigated another variant of Option 2C's network topology and operating capacity, which is constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby. While this variant is electrically identical to Option 2C, and so provides the same expected market benefits, it is found to have significantly greater costs and so has not been progressed as credible options in the body of this PACR. A discussion of this variant can be found in Appendix B.1.2.

5.3 NEW LINES IN AN ELECTRICAL 'LOOP' BETWEEN MARAGLE, WAGGA WAGGA AND BANNABY

5.3.1 Option 3B – New 500 kV lines in an electrical 'loop' initially operated at 330 kV between Maragle, Wagga Wagga and Bannaby

This option involves constructing new 500 kV lines initially operated at 330 kV between Maragle, Wagga Wagga and Bannaby, and a phase shifting transformer on Bannaby – Sydney West 330 kV line.



The high level scope includes:

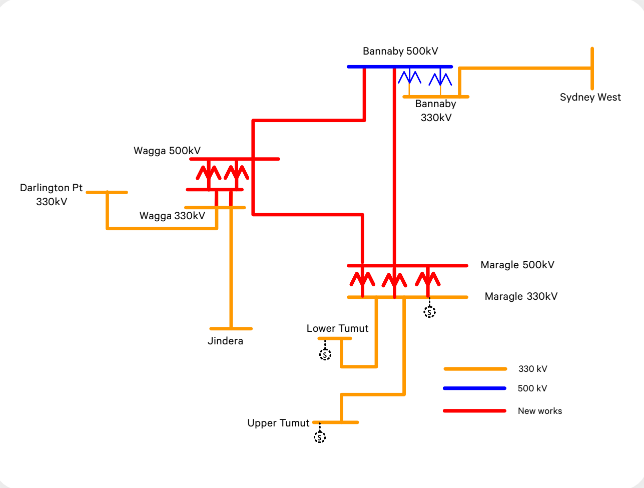
- Construct three 500 kV transmission lines:
  - Between Maragle switching station and Bannaby 330 kV substation;
  - Between Maragle and Wagga Wagga 330 kV switching stations; and
  - Between Wagga Wagga 330 kV switching station and Bannaby 330 kV substation
- Phase shifting transformers on Bannaby-Sydney West 330 kV line
- New Wagga Wagga 330 kV switching station
- Augment the Maragle switching station to accommodate the additional transmission lines
- Augment the existing substations at Wagga Wagga and Bannaby to accommodate the additional transmission lines.

Preliminary modelling indicates that additional 2,030 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

80. The 330 kV to 500 kV upgrade costs were not estimated as part of the PACR assessment as an initial assumption to investigate how these options fared relative to the other options before resources were dedicated to estimating the upgrade costs. Since the flexible options are found to always be inferior to the fixed 500 kV options, we have not estimated the upgrade costs as part of this PACR. We consider this a proportionate approach to considering these options.

5. Seven options have been assessed (continued)

The initial estimated capital cost of this option is approximately $3,782 million. There would be additional costs associated with upgrading from 330 kV to 500 kV as well but these have not been estimated as part of this PACR.[80]



5.3.2 Option 3C – New 500 kV double-circuit lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby

This option involves constructing new 500 kV double-circuit lines between Maragle, Wagga Wagga and Bannaby.

The high level scope includes:

- New Wagga Wagga 500/330 kV substation and 330kV double circuit connection to the existing Wagga Wagga 330kV substation
- Construct three 500 kV transmission lines:
  - Between Maragle and Bannaby 500 kV substations;
  - Between Maragle and Wagga Wagga 500 kV substations; and
  - Between Wagga Wagga and Bannaby 500 kV substations
- Three new 500/330/33 kV 1,500 MVA transformers at Maragle substation and two new 500/330/33 kV 1,500 MVA transformers at new Wagga Wagga 500kV substation
- Augment the Maragle substation to accommodate the additional transmission lines
- Augment the existing Wagga Wagga 330kV and Bannaby 500kV substations to accommodate the additional transmission lines

Preliminary modelling indicates that additional 2,570 MW generation could be accommodated at times of average import from VIC and average renewable generation in southern NSW.

The estimated capital cost of this option is approximately $3,317 million.

As part of the PACR analysis, we have investigated two other variants of Option 3C's network topology and operating capacity, i.e:

- Option 3C-0 – constructed as a 100 per cent single-circuit configuration;[81] and
- Option 3C-1 – constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby.

While these variants are electrically identical to Option 3C, and so provide the same expected market benefits, they are found to have significantly greater costs and so have not been included in the body of this PACR. A discussion of these variants can be found in Appendix B.1.2.

81. Option 3C-0 represents the ISP candidate option, as identified by AEMO in its 2020 ISP. See AEMO, *2020 ISP*, July 2020, Appendix 3, p. 30.

6. Ensuring the robustness of the analysis

SUMMARY OF KEY POINTS:

- The RIT-T assessment considers four ISP scenarios, which differ in relation to demand outlook, DER uptake, assumed generator fuel prices, assumed emissions targets, retirement of coal-fired power stations, timing of major transmission augmentations and generator and storage capital costs.
- The scenarios cover a broad range of potential outcomes across the key uncertainties that are expected to affect the future market benefits of the investment options being considered and reflect the scenarios used by AEMO in the final 2020 ISP.
- The weighting of the scenarios has been updated since the PADR to align with the final 2020 ISP.
- A range of sensitivity tests have also been investigated, to further test the robustness of the outcome to key uncertainties and to test the likely impact of changes to assumptions in the 2022 ISP.

The transmission investments considered as part of this RIT-T involve long-lived assets, and it is important that the recommended preferred option does not depend on a narrow view of future outcomes, given that the future is inherently uncertain.

Uncertainty is captured under the RIT-T framework through the use of plausible scenarios, which reflect different assumptions about future market development, and other factors that are expected to affect the relative market benefits of the options being considered. The adoption of different plausible scenarios tests the robustness of the RIT-T assessment to different assumptions about how the energy sector may develop in the future.

The robustness of the outcome is also investigated through the use of sensitivity analysis in relation to key input assumptions. The sensitivity tests investigated in this PACR have been informed by submissions to the PADR. We have also undertaken a sensitivity to assess the impact of adopting the draft 2021 IASR assumptions.

6.1 THE ASSESSMENT CONSIDERS FOUR 'REASONABLE SCENARIOS'

The RIT-T is focused on identifying the top ranked credible option in terms of expected net benefits. However, uncertainty exists in terms of estimating future inputs and variables (termed future 'states of the world').

To deal with this uncertainty, the NER requires that costs and market benefits for each credible option are estimated under reasonable scenarios and then weighted based on the likelihood of each scenario to determine a weighted ('expected') net benefit. It is this 'expected' net benefit that is used to rank credible options and identify the preferred option.

The credible options have been assessed under four scenarios as part of this PACR assessment, which reflect the scenarios adopted by AEMO in the 2020 ISP.[82]

While the scenarios are the same as applied in the PADR assessment, some of the specific assumptions feeding into them have been updated to align with the final 2020 IASR and final 2020 ISP and the ESOO published in August 2020. In particular:

- the QNI Medium and Large ISP projects are now reflected in the base case; and
- the PADR assumptions regarding the implications of the COP21 commitment and VRET/QRET have been updated.

In addition, the assessment now models the retirement dates of coal-fired generators based on when it is economic for these plants to retire, as opposed to the broad range of dates applied in the PADR. The approach taken is consistent with what AEMO applied in the 2020 ISP and is covered in more detail as part of the accompanying market modelling report.

The table below summarises the specific key variables that influence the net benefits of the options under each of the four scenarios considered.

Additional detail and discussion of each scenario is provided in the accompanying market modelling report released alongside this PACR.

82. AEMO, *Integrated System Plan*, July 2020, p. 86.

6. Ensuring the robustness of the analysis (continued)

Table 6-1 PACR modelled scenario's key drivers input parameters

KEY DRIVERS INPUT PARAMETER	CENTRAL	STEP-CHANGE	SLOW-CHANGE	FAST-CHANGE
Underlying consumption	ESOO 2020 Central	ESOO 2020 Step Change	ESOO 2020 Slow Change	ESOO 2020 Fast Change
Economic growth and population outlook	Moderate	High	Low	Moderate
Energy efficiency improvement	Moderate	High	Low	Moderate
DSP	Moderate	High	Low	Moderate
Rooftop PV	Moderate	High	Low	Moderate-High
Battery storage	Moderate	High	Low	Moderate-High
EV uptake	Moderate	High	Low	Moderate-High
New entrant capital cost for wind, solar SAT, OCGT, CCGT, and large-scale batteries	AEMO 2020 ISP Central	AEMO 2020 ISP Step Change	AEMO 2020 ISP Slow Change	AEMO 2020 ISP Fast Change
Gas fuel cost	Core Energy 2019, Neutral	Core Energy 2019, Fast	Core Energy 2019, Slow	Core Energy 2019, Neutral
Coal fuel cost	WoodMackenzie 2019, Neutral	WoodMackenzie 2019, Fast	WoodMackenzie 2019, Slow	WoodMackenzie 2019, Neutral
Federal Large-scale Renewable Energy Target (LRET)	33 TWh per annum by 2020 to 2030 (including GreenPower and ACT scheme), accounting for contribution to LRET by Western Australia (WA), Northern Territory (NT) and off grid locations			
COP21 commitment (Paris agreement)	26% emissions reduction from 2005 levels by 2030.			
NEM carbon budget to achieve 2050 emissions levels	NA	Cumulative NEM electricity sector emissions budget to 2050 of 1,465 Mt CO2-e	NA	Cumulative NEM electricity sector emissions budget to 2050 of 2,208 Mt CO2-e
Victoria Renewable Energy Target (VRET)	40% renewable energy by 2025 and 50% renewable energy by 2030			
Queensland Renewable Energy Target (QRET)	50% renewable energy by 2030		NA	
Tasmanian Renewable Energy Target (TRET)	100% by 2022	100% by 2022 and 200% by 2040	100% by 2022	
NSW Electricity Infrastructure Roadmap	See section 2.1.3.			
EnergyConnect	1 July 2024			
Western Victoria Renewable Integration RIT T	All scenarios: 2025-26 (1 July 2025)			
Marinus Link and Battery of the Nation	1st cable 2036-37, 2nd cable not needed	1st cable 2028-29, 2nd cable 2031-32	NA	1st cable 2031-32, 2nd cable not needed
Victoria to NSW, Interconnector Upgrades	VNI Minor 2022-23; VNI West 2028-29[83]	VNI Minor 2022-23; VNI West 2035-36	VNI Minor 2022-23; VNI West: NA	VNI Minor 2022-23; VNI West: 2035-36
NSW to QLD Interconnector Upgrades	QNI minor, 1/07/2022; QNI Medium 2032-33, QNI Large 2035-36		QNI minor, 1/07/2022; QNI medium and large: NA	QNI minor, 1/07/2022; QNI Medium 2032-33, QNI Large 2035-36
Snowy 2.0	Snowy 2.0 is included from 1 July 2025			

It is not expected that these variables reflect all future uncertainties that may affect future market benefits of the options being considered, but are expected to provide a broad enough 'envelope' of where these variables may reasonably be expected to fall.

83. As outlined in section 2.2.5, we have assumed an earlier commissioning date for VNI West under the central scenario than in the core 2020 ISP assumptions, consistent with AEMO's accelerated delivery date in the 2020 ISP (and the draft 2021 IASR timing). Specifically, we have assumed a timing of 2028/29 for VNI West under the central scenario. We have also investigated a sensitivity assuming the core ISP timing of 2035/36 (see section 8.4.2).

6. Ensuring the robustness of the analysis (continued)

6.2 WEIGHTING THE SCENARIOS

We have weighted each of the above scenarios using the probabilities proposed by AEMO in the final 2020 ISP for HumeLink, i.e.:[84]

- 40 per cent to the central scenario;
- 30 per cent to the fast-change scenario;
- 20 per cent to the step-change scenario; and
- 10 per cent to the slow-change scenario.

While the above probabilities have been applied to weight the estimated market benefits and identify the preferred option across scenarios (illustrated in section 8), we have carefully considered the results in each scenario in section 8. We have also investigated a sensitivity that amends the scenario weightings applied based on recent commentary from the Energy Security Board (ESB) (presented in section 8.4.4).

6.3 SENSITIVITY ANALYSIS

In addition to the scenario analysis, we have also considered the robustness of the outcome of the cost benefit analysis through undertaking a range of sensitivity testing.

The range of factors tested as part of the sensitivity analysis in this PACR are:

- the impact of the recently announced new Kurri Kurri and Tallawarra B gas generators;
- delaying VNI West until 2035/36 (in-line with the core 2020 ISP assumption for the central scenario);
- whether adding MPFC as proposed by Smart Wires would increase the expected net benefits of the preferred option;
- increasing the weighting of the step-change scenario, in-line with recent commentary from the ESB;
- adopting higher and lower network capital costs of the credible options (including P90 estimates);
- alternate commercial discount rate assumptions; and
- adopting the draft 2021 IASR assumptions.

The results of the sensitivity tests are discussed in section 8.4.

The above list of sensitivities focuses on the key variables that could impact the identified preferred option.

84. AEMO, *2020 Integrated System Plan*, July 2020, p. 86.

7. Estimating the market benefits

SUMMARY OF KEY POINTS:

- Eight categories of market benefit under the RIT-T are considered material for this RIT-T and have been estimated as part of the economic assessment for the credible options within this PACR.
- 'Option value' has been estimated for both the flexible 500 kV options as well as going via Wagga Wagga.
- Competition benefits have been included in the PACR analysis and modelled using the 'Frontier approach'.
- Wholesale market modelling has been used to estimate these categories of market benefits.
- The market modelling assumptions and inputs have been updated since the PADR to align with those used in the final 2020 ISP and the 2020 ESOO.
- A separate modelling report has been released alongside this PACR that provides greater detail on the modelling approaches and assumptions, including details on the technical constraints adopted.

As outlined in section 3, the key benefits expected from increasing transmission capacity are driven by anticipated changes in wholesale market outcomes going forward.

The RIT-T requires categories of market benefits to be calculated by comparing the 'state of the world' in the base case where no action is undertaken, with the 'state of the world' with each of the credible options in place, separately. The 'state of the world' is essentially a description of the NEM outcomes expected in each case, and includes the type, quantity and timing of future generation investment as well as unrelated future transmission investment (e.g., that is required to connect REZ).

A wholesale market modelling approach has been applied to estimate the market benefits associated with each credible option included in this RIT-T assessment. The wholesale market modelling has also been applied to the base case for each scenario, i.e., the state of the world without a Humelink option in it.[85]

This section first outlines the specific categories of market benefit that are expected from reinforcing the Southern Shared Network of New South Wales, before providing an overview of the wholesale market modelling undertaken.

We are publishing a separate modelling report alongside this PACR that provides greater detail on the modelling approach and assumptions, to provide transparency to market participants.

7.1 EXPECTED MARKET BENEFITS FROM EXPANDING TRANSFER CAPACITY

The specific categories of market benefit under the RIT-T that have been modelled as part of this PACR are:

- changes in fuel consumption in the NEM arising through different patterns of generation dispatch;
- changes in costs for parties, other than the RIT-T proponent (i.e., changes in investment in generation and storage);
- differences in unrelated transmission investment (in particular, the cost of connecting REZ assumed in the 2020 ISP);
- changes in involuntary load curtailment;
- changes in voluntary load curtailment;
- changes in network losses;
- competition benefits; and
- option value associated with the flexible 500 kV options (i.e., options 2B and 3B).

We have estimated all of the market benefits categories, with the exception of competition benefits, across all of the options considered in this PACR (the 'positioning analysis'). We have then considered the top two ranked options, and estimated competition benefits for those options, as part of the formal RIT-T assessment.

All market benefits for the credible options are presented in this PACR as being relative to the base case for each scenario, i.e., the state of the world without the Humelink option in it.

The approach taken to estimating each of these market benefits is outlined below and discussed in greater detail in the accompanying market modelling report.

85. The RIT-T requires that in estimating the magnitude of market benefits, a market dispatch modelling methodology must be used, unless the TNSP(s) can provide reasons why this methodology is not relevant. See: AER, *Final Regulatory Investment Test for Transmission*, June 2010, version 1, paragraph 11, p. 6.

7. Estimating the market benefits (continued)

7.1.1 Changes in fuel consumption in the NEM

This category of market benefit is expected where credible options result in different patterns of generation and storage dispatch across the NEM, compared to the base case.

In particular, the primary effects of reinforcing the NSW Southern Shared Network come from enabling demand centres to be supplied by lower cost generation than can be expected if no upgrade is undertaken. The market modelling finds that new renewable generation avoids the need for gas-fired generation to operate. As outlined in section 8, this is a key category of benefit estimated for all scenarios (except under the slow-change scenario).[86]

7.1.2 Changes in costs for other parties in the NEM

This category of market benefit is expected where credible options result in different investment patterns of generators and large-scale storage across the NEM, compared to the base case.

In particular, the market modelling finds that there are large amounts of avoided new dispatchable generation in NSW compared to the base case. As shown in section 8, these avoided or deferred, costs associated with generation and storage are the largest category of market benefit estimated across all options and scenarios.

7.1.3 Differences in unrelated transmission costs

This benefit category relates to the costs of intra-regional transmission investment associated with the development of REZs that could be avoided if a credible option is pursued.

AEMO has identified a number of REZs in various NEM jurisdictions as part of the ISP and has included allowances for transmission augmentations that it considers would be required to develop those REZs. In addition, as outlined in section 2.2.3, while the NSW Government Roadmap REZs were not included in the final 2020 ISP, we have reflected it in the market modelling for the PACR since it is now legislated (and note this approach is consistent with the draft 2021 IASR assumptions). The credible options being considered in this RIT-T can allow development of some of these REZs without the need for additional intra-regional transmission investment (or less of it).

7.1.4 Changes in involuntary load curtailment

Increasing the transmission transfer capacity in southern New South Wales increases the generation supply availability from existing generation to meet New South Wales demand. This will provide greater reliability for each state by reducing the potential for supply shortages and the consequent risk of involuntary load shedding.

This market benefit involves quantifying the impact of changes in involuntary load shedding associated with the implementation of each credible option via the time sequential modelling component of the market modelling. Specifically, the modelling estimates the MWh of unserved energy (USE) in each trading interval over the modelling period, and then applies a Value of Customer Reliability (VCR, expressed in $/MWh) to quantify the estimated value of avoided USE for each option.

While the PADR adopted AEMO's standard assumptions for VCR, this PACR now applies the recently estimated AER VCR values.

This category of market benefit has been found to be relatively small within the market modelling. This is due to there not being a material difference in the quantity of involuntary load shedding between each option and the base case, under each of the scenarios. The reason is that, for both the options and the base cases, it is economic to build sufficient dispatchable capacity to maintain high levels of reliability.

7.1.5 Changes in voluntary load curtailment

Voluntary load curtailment is when customers agree to reduce their load once wholesale prices in the NEM reach a certain threshold. Customers usually receive a payment for agreeing to reduce load in these circumstances. Where the implementation of a credible option affects wholesale price outcomes, and in particular results in wholesale prices reaching higher levels in some trading intervals than in the base case, this may have an impact on the extent of voluntary load curtailment.

This class of market benefit has also been found to be relatively low within the market modelling, reflecting that the level of voluntary load curtailment currently present in the NEM is not significant. As for changes in involuntary curtailment outlined above, the model will build additional capacity if that is more economic than the market costs of voluntary load curtailment.

7.1.6 Changes in network losses

The time sequential market modelling has taken into account the change in network losses that may be expected to occur as a result of the implementation of each of the credible options, compared with the level of network losses which would occur in the base case, for each scenario.

The benefit of changes to network losses is captured within the wholesale market modelling of dispatch cost benefits of avoided fuel costs and changes to voluntary and involuntary load shedding.

The reduction in network losses between the base case and the options is material for the options considered in this PACR (particularly for the 500 kV options) and reduces both the energy to be produced by fossil fuel generators to account for the losses, and a reduction in new capacity that has to be built to supply demand, particularly during peak periods.

7.1.7 Option value

This PACR investigates whether there is significant option value associated with flexible options, which would readily and cost-effectively increase the transfer capacity between the Snowy Mountains and Sydney in the future. This is investigated through inclusion of option variants that would be built at 500 kV but initially operated at 330 kV (options 2B, 3B). These options provide flexibility to 'scale up' transfer capacity at a later date, in response to changes in demand and/or the expansion of generation capacity along the transmission corridor, whilst avoiding upfront investment associated with higher capacity.

The modelling in this PACR estimates the option value associated with these flexible options as part of the scenario analysis, which is in line with the AER's cost benefit assessment guidelines.[87] Specifically, the flexible options are assumed to operate at 330 kV until the benefits from upgrading to 500 kV exceed the annualised upgrade cost. Since the benefits from each of these flexible options differ across the scenarios, the PACR modelling finds it is optimal to upgrade these options to 500 kV at different times for each scenario. Specifically, the PACR modelling

86. AER, *Guidelines to make the Integrated System Plan actionable*, August 2020, pp, p. 37-42.
87. AER, *Guidelines to make the Integrated System Plan actionable*, August 2020, pp, p. 37-42.

7. Estimating the market benefits (continued)

finds that it is optimal to upgrade these flexible options from 330 kV to 500 kV in the following years:[88]

- 2030-31 in the central scenario;
- 2032-33 in the fast-change scenario;
- 2029-30 in the step-change scenario; and
- 2035-36 in the slow-change scenario.

As outlined in section 8, the flexible 500 kV options are found to provide lower net benefits than the fixed 500 kV options under all scenarios.[89]

7.1.8 Competition benefits

The PADR concluded that we did not expect competition benefits to be material in terms of identifying the preferred option for this RIT-T, due to the modelling finding that the largest capacity options were preferred (which can be expected to have the greatest impact on any competition benefits). We note that AEMO did not consider competition benefits in its 2020 ISP.

However, additional testing of expected competition benefits undertaken following the PADR, showed that they are in fact expected to constitute a substantial benefit category for this RIT-T. This is consistent with previous commentary by Frontier Economics, who have noted the importance of competition benefits for investments like Humelink.[90]

Failure to adequately consider competition benefits would therefore substantially underestimate the potential market benefits associated with HumeLink, and therefore the net market benefit (which may be material to the RIT-T outcome if the assessment excluding competition benefits were to find that no option has a positive net market benefit).

As a consequence, we have now estimated competition benefits in this RIT-T. This is consistent with the AER's latest cost benefit analysis guidelines, under which a RIT-T proponent has discretion when considering whether to quantify a market benefit class that AEMO did not include in the ISP. In applying its discretion, the AER states that the RIT-T proponent should consider whether doing so is likely to materially affect the outcome of the CBA, and that the associated computational burden of including it is not expected to be disproportionate to the potential benefits.[91] We have taken this as guidance on how to apply the RIT-T for Humelink on the basis that it is an actionable ISP project and the cost benefit analysis guidelines are critical to actionable ISP project, despite it not being strictly applicable to Humelink. Including competition benefits in the assessment is also consistent with the NER requirements for the PACR (i.e., those under clauses 5.16A.4(d)(5) and 5.16A.4(j)(1)).

We have focused on the two highest ranked options (from the 'positioning analysis', which excludes competition benefits – see section 8.2). This is due to the time required and complexity of estimating competition benefits. We consider this a proportionate approach, as the extent of competition benefits is unlikely to differ materially between options of the same capacity, and so is not expected to change the ranking of options.

Competition benefits arise when there is a change in the dispatch of generators and/or storage in the market in light of a credible option being commissioned. Specifically, they occur when there is a change in the way these entities dispatch so that there is overall more efficient dispatch in the market than under the base case, and a price impact that allows consumers to benefit through a change in their consumption decisions.

The AER suggest two possible methodologies for identifying that component of market benefits attributable to competition benefits – the 'Biggar approach' and the 'Frontier approach'. Both of these approaches involve the same methodology for calculating the overall market benefits of a credible option. The difference between the two approaches is in how to divide the overall market benefits of a credible option between competition benefits and other benefits (also referred to as 'efficiency benefits').[92]

We have adopted the Frontier approach as part of this PACR, which involves finding the difference between the change in overall economic surplus resulting from the credible option:

- assuming bidding reflected the prevailing degree of market power both before and after the augmentation; and
- assuming competitive bidding both before and after the augmentation.

Section 7.3 provides more detail on how the Frontier approach has been applied in the context of this PACR.

88. The 330 kV to 500 kV upgrade costs have not been estimated as part of the PACR and so this analysis has been undertaken assuming the upgrade costs from the PADR, which are lower than what is expected now due to the general increase in costs between the PADR and PACR. The flexible options (i.e., the 'B' options) therefore assume that they are upgraded from 330 kV to 500 kV at the dates listed above, and so attract greater market benefits from this upgrade, but do not include the cost of the upgrade (which means that their net benefits are over-estimated compared to if the upgrade costs were included). This approach was taken as an initial assumption to investigate how these options fared relative to the other options before resources were dedicated to estimating the upgrade costs and, since the flexible options are found to always be inferior to the fixed 500 kV options, we have not estimated the upgrade costs as part of this PACR (which we consider a proportionate approach to considering these options).
89. Option 1B, Option 2B, and Option 3B, being the flexible 500 kV options, are ranked 6th, 7th and 4th respectively in the positioning assessment. These flexible options consistently exhibit lower net benefits than their corresponding fixed 500 kV options due to their higher initial costs.
90. Frontier Economics have previously stated that with more new generators and loads connecting to the power system, which will have a diminishing impact on non-competition related benefits, competition benefits will become an increasingly important source of the benefits of interconnection. See: Frontier Economics, Evaluating interconnection competition benefits. Available at: https://www.aer.gov.au/system/files/Frontier%20Economics%20report%20-%20evaluating%20interconnection%20competition%20benefits%20-%20September%202004.pdf. Accessed 28 June 2021
91. AER, *Guidelines to make the Integrated System Plan actionable*, August 2020, p. 61.
92. AER, *Application guidelines Regulatory Investment Test for Transmission*, August 2020, p. 88.

7. Estimating the market benefits (continued)

7.2 WHOLESALE MARKET MODELLING HAS BEEN USED TO ESTIMATE MARKET BENEFITS

We engaged EY to undertake the wholesale market modelling to assess the market benefits expected to arise under each of the credible options and scenarios.

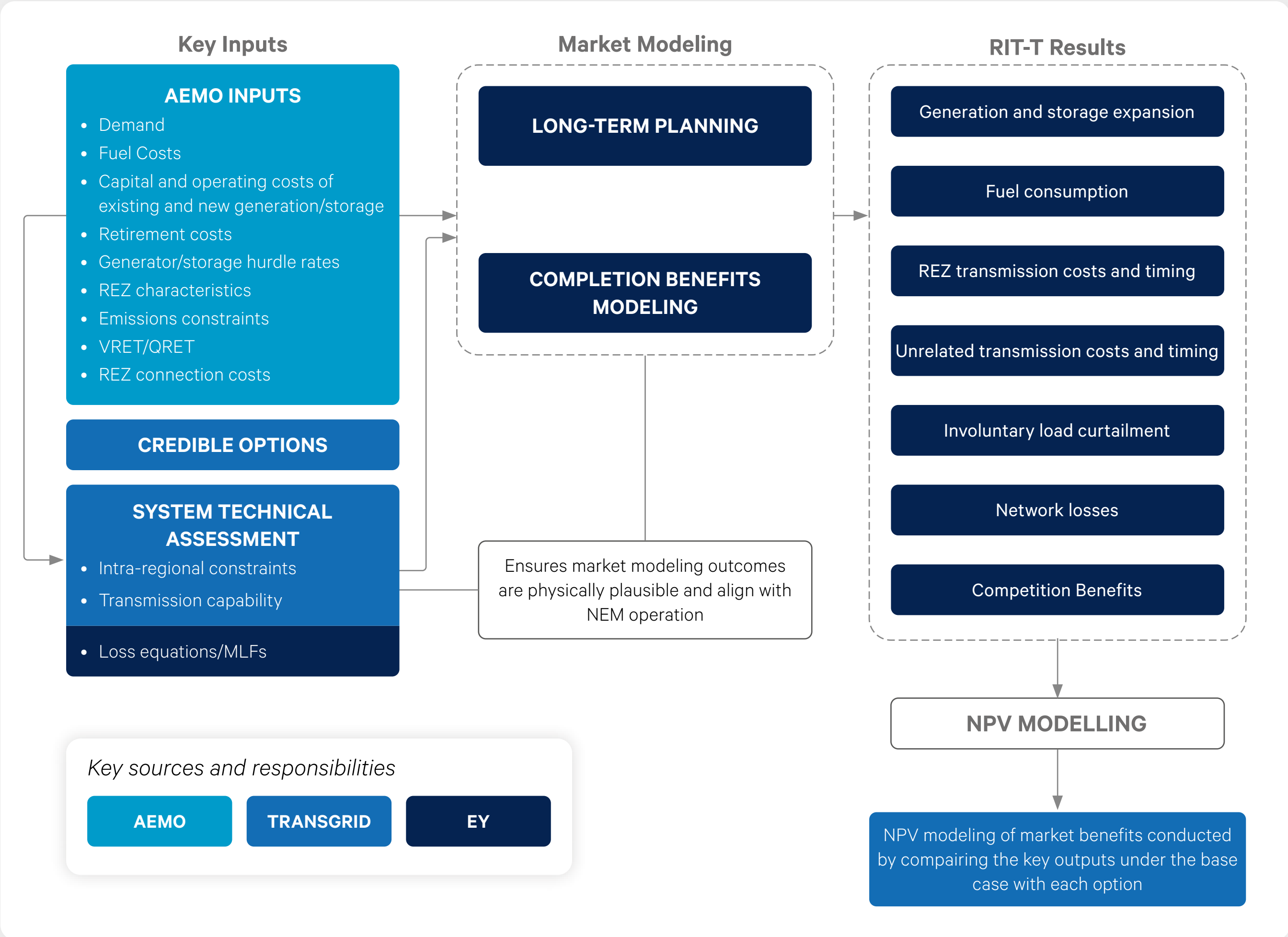
EY has applied a linear optimisation model and performed hourly, time-sequential, long-term modelling for the NEM to estimate categories of wholesale market benefits expected under each of the options. Specifically, EY has undertaken long-term Investment Planning which identifies the optimum generation (including storage) and unrelated transmission infrastructure development schedule, while meeting reliability requirements, policy objectives, and technical generator and network performance limitations for both the base case and each of the different options.

We have undertaken a detailed System Technical Assessment, which evaluates the power system behaviour and performance under each credible option and ensures market modelling outcomes are physically plausible, follow the operation of the NEM, and that the benefits of credible options align with the changes to the power system under each credible option. This assessment serves as an input to the wholesale market modelling exercises EY has undertaken (as outlined above).

These exercises are consistent with an industry-accepted methodology, including within AEMO's ISP.

Figure 4 illustrates the interactions between the key modelling exercises, as well as the primary party responsible for each exercise and/or where the key assumptions have been sourced.

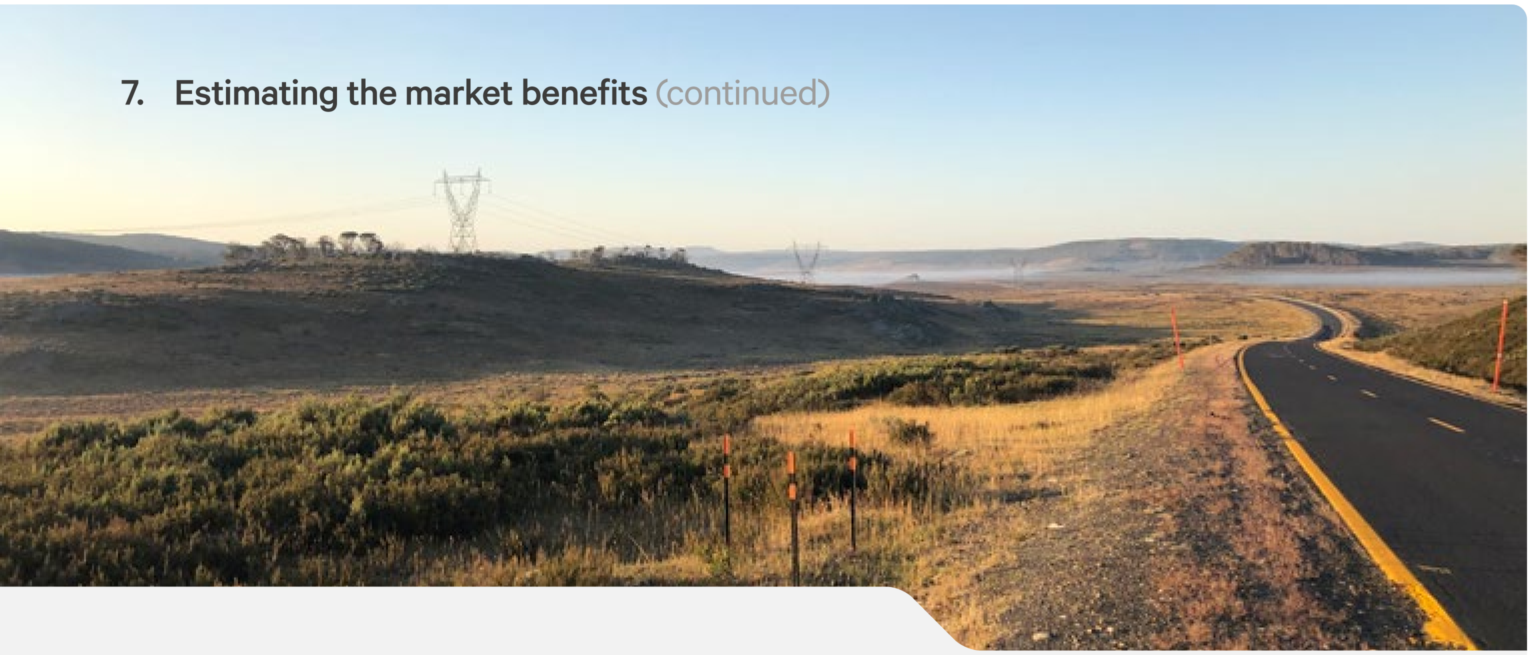
Figure 4 – Overview of the market modelling process and methodologies



As these modelling exercises investigate different aspects of the market simulation process, they necessarily interact and are executed iteratively using inputs and outputs.

The accompanying market modelling report provides additional detail on these modelling exercises, as well as the key modelling assumptions and approach adopted more generally.

7. Estimating the market benefits (continued)



7.3 COMPETITION BENEFITS HAVE BEEN ESTIMATED

Clause 5.15A.3(b)(4) of the NER requires a RIT–T proponent to consider competition benefits as a class of potential market benefits that could be provided by a credible option. Competition benefits are likely to occur if a credible option could impact the bidding behaviour of generators (and other market participants) who may have a degree of market power relative to the base case.

The importance of competition benefits has been highlighted by Frontier Economics, where it is stated that with more new generators and loads connecting to the power system, which will have a diminishing impact on non-competition related benefits, competition benefits will become an increasingly important source of the benefits of interconnection.[93]

At a high-level, competition benefits are calculated as the difference between the following present values of the overall economic surplus:[94]

- arising with the credible option assumed, with bidding behaviour reflecting any market power prevailing with that option in place; and
- in the base case, with bidding behaviour reflecting any market power in the base case.

The AER suggest two possible approaches for estimating competition benefits, known as the 'Biggar approach' and the 'Frontier approach', where their difference is in how to divide the overall market benefits of a credible option between competition benefits and other benefits (also referred to as 'efficiency benefits').

In order to define generators and portfolios with some degree of market power, EY has used the latest analysis conducted by Frontier Economics[95] and confirmed their findings. However, a shorter list of generators has been considered since, with the assumption of economic retirement in the modelling, some generators in the Frontier Economics list either retire earlier than when HumeLink is commissioned or within a short time after that and thus make a minimal contribution to competition benefit estimation.

The EY model is adjusted to use the capacity build and retirements that result from long-term investment planning under the base case on which the economic dispatch is run. Hydro and energy-limited storages are optimised in the model in such a way they maximise their water values while not exceeding their storage and inflow characteristics. The model is run on both the base case and option cases for two sets of bidding, i.e. competitive and strategic bidding. The modelling of competitive bidding allows subtracting the benefits of fuel and VOM from the total benefits in the strategic bidding in order to avoid double counting these benefits in non-competition benefits modelling and competition benefits modelling.

For further details on the modelling of competition benefits, please refer to the accompanying market modelling report.

7.4 GENERAL MODELLING PARAMETERS ADOPTED

The RIT-T analysis spans a 25-year assessment period from 2021/22 to 2045/46.

Where the capital components of the credible options have asset lives extending beyond the end of the assessment period, the NPV modelling includes a terminal value to capture the remaining asset life. This ensures that the capital cost of long-lived options over the assessment period is appropriately captured, and that all options have their costs and benefits assessed over a consistent period, irrespective of option type, technology or asset life. The terminal values are calculated as the undepreciated value of capital costs at the end of the analysis period and can be interpreted as a conservative estimate for benefits (net of operating costs) arising after the analysis period. We note that for this RIT-T, the terminal value assumption is not material in terms of the outcome, with the benefits generated by the preferred option exceeding the total estimated project costs before the end of the assessment period.

A real, pre-tax discount rate of 5.90 per cent has been adopted as the central assumption for the NPV analysis presented in this PACR, consistent with the assumptions adopted in the ISP. The RIT-T requires that sensitivity testing be conducted on the discount rate and that the regulated weighted average cost of capital (WACC) be used as the lower bound. We have therefore tested the sensitivity of the results to a lower bound discount rate of 2.23 per cent,[96] and an upper bound discount rate of 7.90 per cent (i.e., consistent with the 2020 IASR).

93. Frontier Economics, Evaluating interconnection competition benefits. Available at: https://www.aer.gov.au/system/files/Frontier%20Economics%20report%20-%20evaluating%20interconnection%20competition%20benefits%20-%20September%202004.pdf. Accessed 28 June 2021.
94. AER, Application guidelines - Regulatory investment test for transmission (August 2020). Available at: https://www.aer.gov.au/system/files/AER%20-%20Regulatory%20investment%20test%20for%20transmission%20application%20guidelines%20-%2025%20August%202020.pdf. Accessed 28 June 2021.
95. Frontier Economics, *Modelling of Liddell* power station closure, 6 December 2019 – available at: https://www.energy.gov.au/sites/default/files/Frontier%20Economics%20Modelling%20of%20Liddell%20Power%20Station%20Closure.pdf (accessed 28 June 2021).
96. This is equal to WACC (pre-tax, real) in the latest final decision for a transmission business in the NEM, see: https://www.aer.gov.au/networks-pipelines/determinations-access-arrangements/directlink-determination-2020-25

8. Net present value results

SUMMARY OF KEY POINTS:

- We have undertaken a positioning assessment covering all seven credible options across each of the four ISP scenarios and find that Option 3C is consistently the top-ranked option, delivering positive net benefits in all scenarios, with the exception of the slow-change scenario, as well as on a weighted basis (in order of $39 million in present value terms).
- The formal RIT-T assessment builds on the positioning assessment and includes estimates of the additional competition benefits expected from the top two ranked options (Option 2C and Option 3C). We find that Option 3C continues to be strongly preferred (with expected net benefits increasing to $491 million in present value terms).
- Under all scenarios, the benefits for Option 3C are primarily driven by avoided, or deferred, costs associated with generation and storage build.
- Avoided generator fuel costs, competition benefits and avoided transmission capital costs to connect new REZ make up the vast majority of other market benefits estimated for Option 3C, with their relativities varying across the scenarios.
- This conclusion is found to be robust to a range of sensitivity tests.
- All market benefits for the credible options are presented as being relative to the base case for each scenario, i.e., the state of the world without a Humelink option in it.

8.1 STRUCTURE OF THE PACR NPV ASSESSMENT

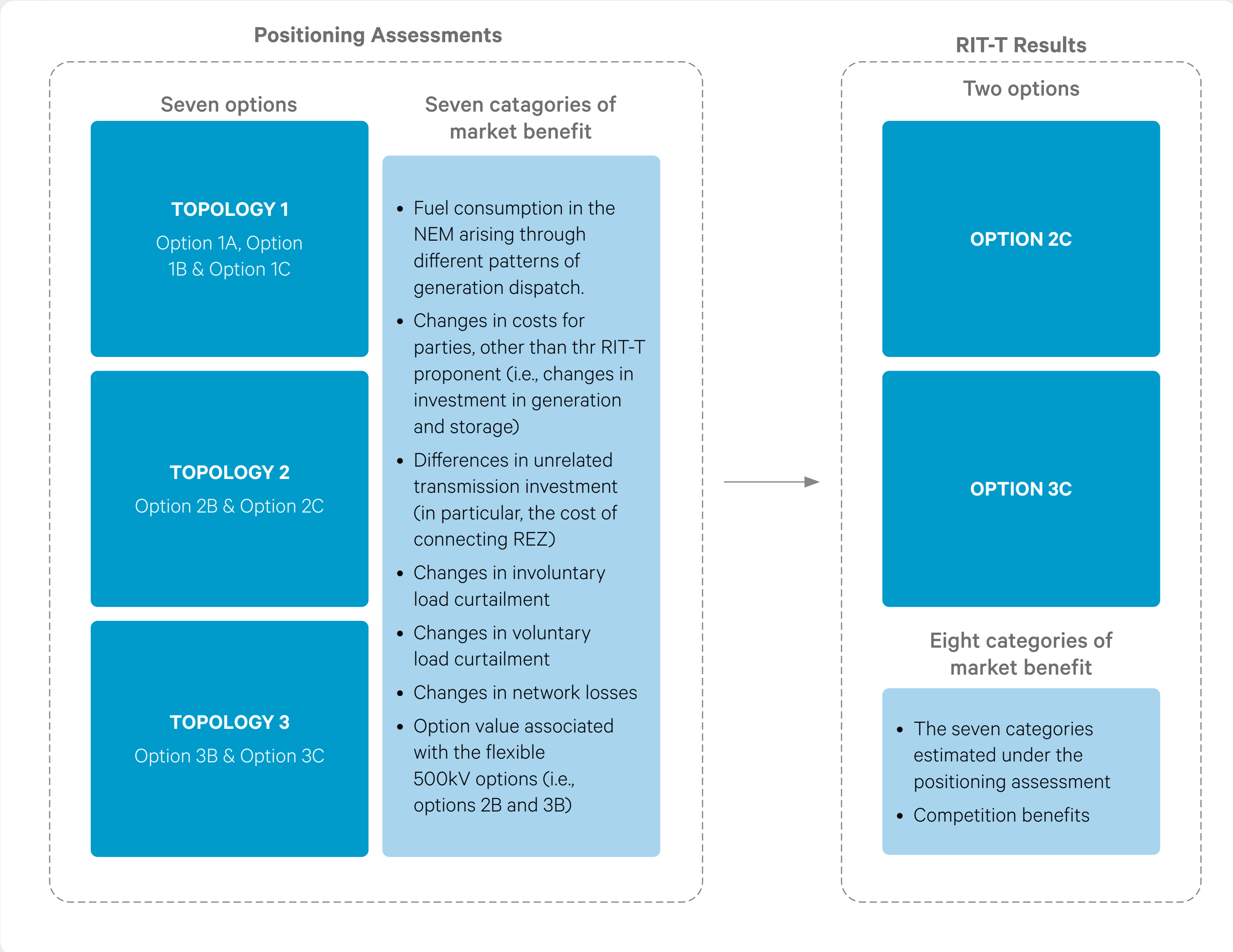
We have applied a two-stage approach to the NPV assessment for the PACR. Specifically, we have:

- undertaken a positioning assessment, which covers all seven credible options across each of the four ISP scenarios; then
- focused the formal RIT-T assessment on the top two ranked options from the positioning assessment (Option 2C and Option 3C).

The key difference between these two stages is that the formal RIT-T assessment includes estimates of the additional competition benefits expected from the top two ranked options. This is considered a proportionate approach to assessing all seven credible options given the complexities and modelling resources required to estimate competition benefits.

8. Net present value results (continued)

Figure 5 – Structure of the NPV assessment



8.2 POSITIONING ASSESSMENT (EXCLUDING COMPETITION BENEFITS)

The positioning assessment assesses all seven credible options across each of the four ISP scenarios. It does not include competition benefits since the modelling required is considerable for each option and is not considered a proportionate exercise for most of the options based on the positioning assessment set-out below. Competition benefits have been estimated for the top-ranked options coming out of the positioning assessment and are presented in section 8.3 below.

8.2.1 Central scenario

The central scenario reflects AEMO's moderate demand forecasts (including Demand-Side Participation (DSP)), neutral gas and coal price forecasts, coal plants retiring on an economic basis (or at the end of their announced/technical lives), as well as a national emissions reduction of around 28 per cent below 2005 levels by 2030.

8. Net present value results (continued)

AEMO describes the central scenario as reflecting 'the current transition of the energy industry under current policy settings and technology trajectories, where the transition from fossil fuels to renewable generation is generally led by market forces and supported by current federal and state government policies'.[97]

The PACR assessment finds that Option 3C has the highest expected net benefit under these assumptions and is the only option with a positive expected net benefit (at $49 million). Option 2C is the second-ranked option with estimated negative net benefits (i.e., a net cost) of $33 million.[98]

Figure 6 shows the overall estimated net benefit for each option under the central scenario.

Figure 6 – Summary of the estimated net benefits under the central scenario – excluding competition benefits

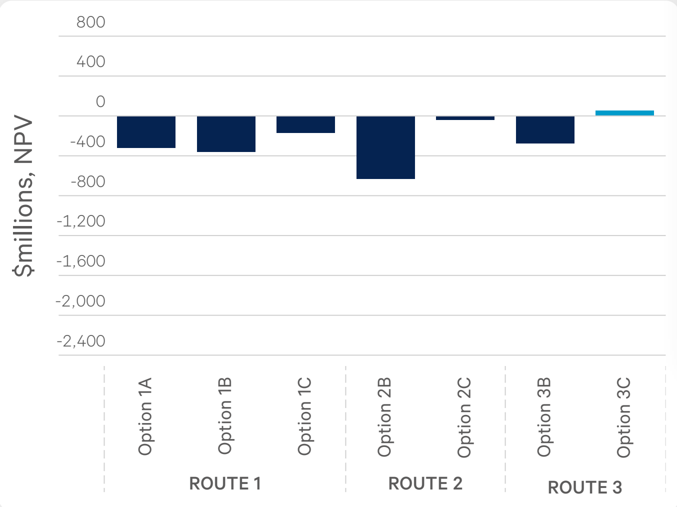
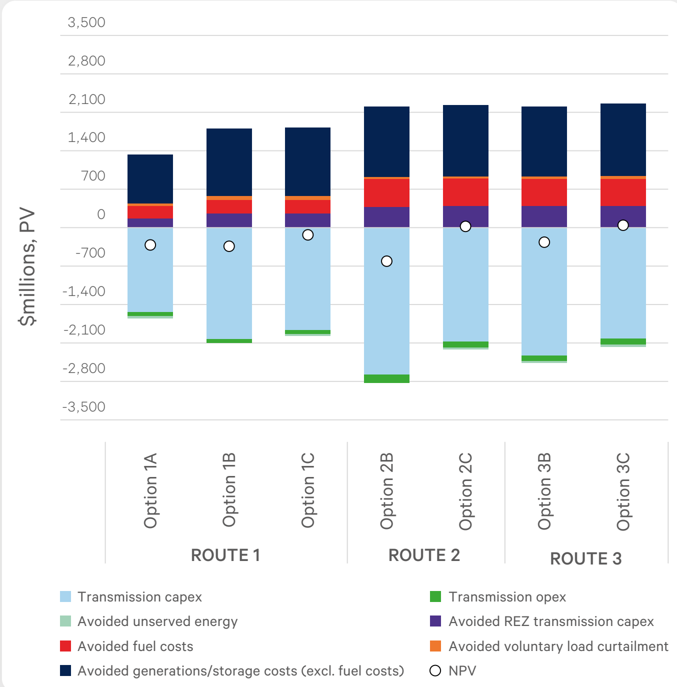


Figure 7 shows the composition of estimated net benefits for each option under the central scenario.

Figure 7 – Breakdown of estimated net benefits under the central scenario – excluding competition benefits



The key findings from the assessment of each option under the central scenario (excluding competition benefits) are that:[99]

- All credible options beside Option 3C are found to deliver negative net market benefits, ranging from approximately -$33 million (Option 2C) to -$639 million (Option 2B).
- The fixed 500 kV options (i.e., the 'C' options) provide the greatest net benefit of the options considered on account of these options providing the greatest (and earliest) increase in transfer capacity.
- Market benefits of all options are primarily derived from avoided/deferred generation and storage capital costs (shown by the dark blue sections of each bar in Figure 7 respectively).
  - These benefits are primarily driven by avoided/deferred large-scale storage (LS battery) developments and avoided solar developments from 2030. While the deferred LS battery capacity starts to be built in the late 2030s, avoided OCGT build from the late 2030s and pumped hydro from the early 2040s results in further market benefits.
  - The market modelling indicates that the majority of capacity deferral/avoidance occurs in New South Wales and, to a lesser extent, in Queensland. Southern states are forecast to have additional installations of renewables as HumeLink allows for a more diverse and higher quality of capacity mix.

97. AEMO, *2019 forecasting and planning scenarios, inputs, and assumptions*, August 2019, p. 3.
98. Calculation of benefits and costs have involved escalation of capital cost inputs and wholesale market benefit inputs. Capital cost inputs are estimated in real 2019/20 dollars and inflated to real 2020/21 dollars. Similarly, wholesale market benefit inputs are modelled in real 2018/19 dollars and inflated to real 2020/21 dollars (except for IASR sensitivity inputs, where market benefit inputs are modelled in 2019/20 dollars). We have used Australia CPI (ABS Series ID A2325846C) to inflate inputs to real 2020/21 dollars. Adjustments to June 2020 and September 2020 quarter CPI were made to smooth out the effects of deflation during these quarters due to the effect of the COVID-19 pandemic. These adjustments were made as the pandemic significantly reduced price levels for furnishings, household equipment and services, transport and education components of CPI that, while relevant for CPI as a whole, is less relevant for transmission project costs or the long term value consumers receive from transmission projects. We also have estimated June 2021 quarter CPI based on an annual inflation rate of 2.5 per cent, being the mid-range of RBA's long term inflation target.
99. The detailed descriptions of the drivers of the key market benefit categories below are based on the market modelling results for Option 3C. Please refer to the accompanying market modelling results, and report, released alongside this PADR for more detail on the market modelling results for all options.

8. Net present value results (continued)

- Avoided fuel costs are the second most material category of market benefit estimated across the options (shown by the red sections of each bar in Figure 7).
  - These arise primarily from lower black coal generation in New South Wales in the early years of the assessment period.
  - In the later years of the modelling period, lower gas generation in New South Wales is forecast to also contribute to fuel cost savings.
- REZ transmission cost savings (shown by the purple sections of each bar in Figure 7) are mainly driven by Humelink allowing builds in REZs with free transmission capacity such as Wagga Wagga and West Victoria to replace/defer REZ transmission expansion in REZs such as Central West Orana.

Figure 8 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the central scenario.[100] It shows the cumulative market benefits, in present value terms (and so the final year's stacked bars align with the overall breakdown of estimated market benefits shown in Figure 7 above).

Figure 8 – Breakdown of cumulative gross benefits for Option 3C under the central scenario[101] - excluding competition benefits

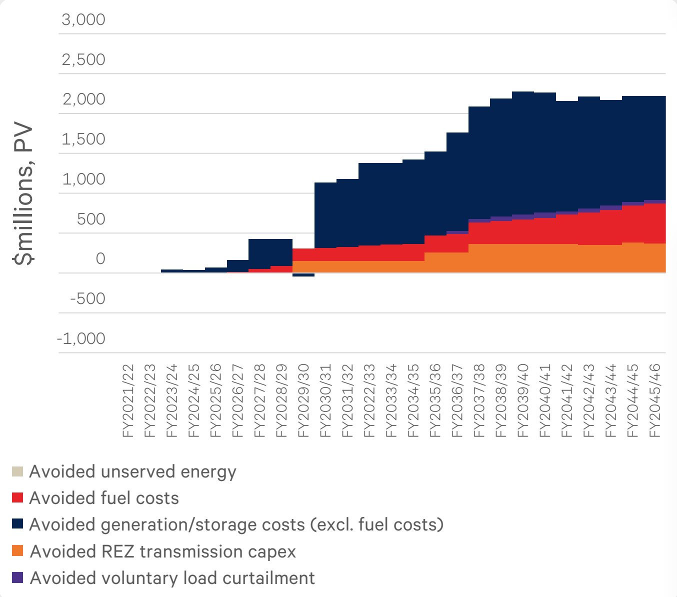


Figure 9 summarises the difference in generation and storage output modelled for Option 3C (in TWh), compared to the base case, i.e., what is found to be driving the avoided fuel cost benefit. The accompanying market modelling results workbook provides the data underpinning this chart, as well as the same data for all other options and scenarios (at both the technology and regional levels).

Figure 9 – Difference in output with Option 3C, compared to the base case, under the central scenario

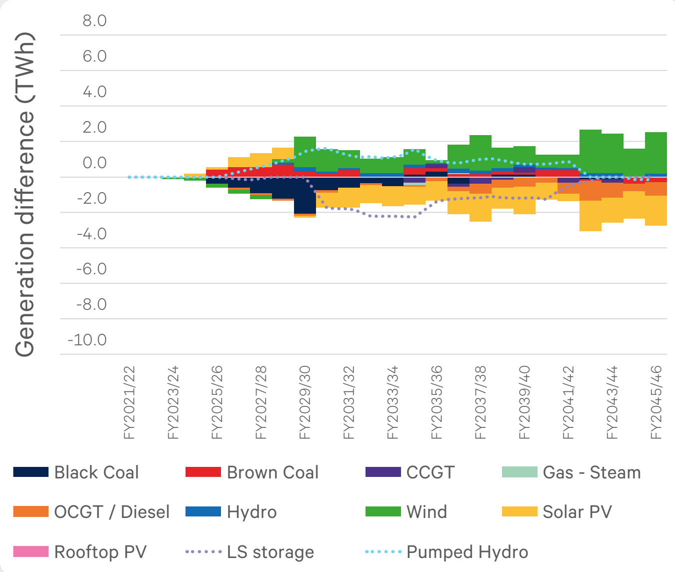
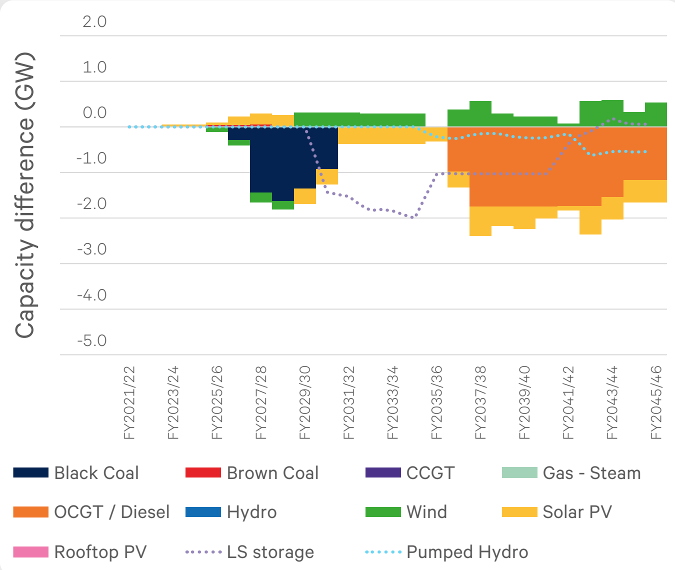


Figure 10 summarises the difference in generation and storage capacity modelled for Option 3C (in GW), compared to the base case, i.e., what is found to be driving the avoided or deferred costs associated with generation and storage benefit.

Figure 10 – Difference in cumulative capacity built with Option 3C, compared to the base case, under the central scenario



While this section (as well as sections 8.2.2, 8.2.3 and 8.2.4) focusses on the drivers of market benefits for Option 3C, we note that the drivers are effectively the same for the second ranked option (Option 2C) under this scenario.

100. This figure only presents the annual breakdown of estimated gross benefits for the preferred option. The separately released spreadsheet presents an annual breakdown of costs and benefits for all options. Since this figure shows the cumulative gross benefits in present value terms, the height of the bar in 2045-46 equates to the gross benefits for Option 3C shown in Figure 7 above.

101. While all generator and storage capital costs have been included in the market modelling on an annualised basis, this chart, and all charts of this nature in the PADR, present the entire capital costs of these plant in the year avoided in order to highlight the timing of the expected market benefits. This is purely a presentational choice that we have made to assist with relaying the timing of expected benefits (i.e., when thermal plant retire) and does not affect the overall estimated net benefit of the options.

8. Net present value results (continued)

8.2.2 Fast-change scenario

The fast-change scenario reflects a state of the world where there is a rapid technology-led transition of the power system and a 'fast-change' in emissions. Assumptions made in the fast-change scenario include AEMO's moderate demand forecasts (including DSP), neutral gas and coal price forecasts, carbon budget, and economic retirements of coal plants.

AEMO describes the fast-change scenario as reflecting a 'rapid technology-led transformation, particularly at grid scale, where advancements in large scale technology improvements and targeted policy support reduce the economic barriers of the energy transmission. In this scenario, coordinated national and international action towards achieving emissions reductions, leading to manufacturing advancements, automation, accelerated retirement of existing generators, and integration of transport into the energy sector'.[102]

The PACR assessment finds that Option 3C has the highest expected net benefit under these assumptions and, besides Option 2C, is the only option with positive net benefits. Option 3C is estimated to deliver approximately $91 million in net benefits under this scenario, while the second-ranked option (Option 2C) has marginally positive estimated net benefits of $9 million.

Figure 11 – Summary of the estimated net benefits under the fast-change scenario – excluding competition benefits

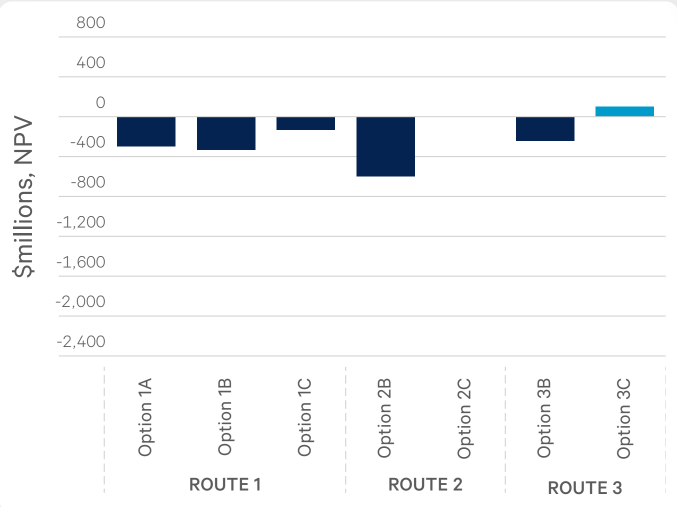
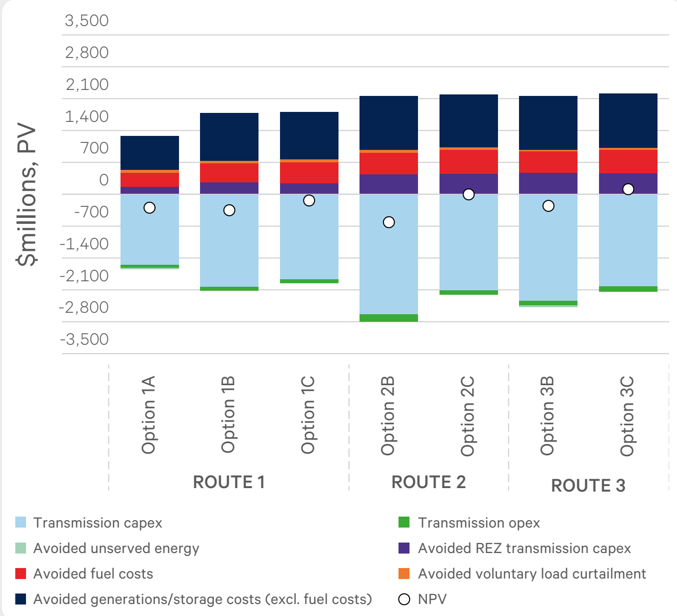


Figure 12 shows the composition of estimated net benefits for each option under the fast-change scenario.

Figure 12 – Breakdown of estimated net benefits under the fast-change scenario – excluding competition benefits



The key findings from the assessment of each option under the fast-change scenario (excluding competition benefits) are that:[103]

- The fast-change scenario results in a slightly higher estimated net benefits for all options compared to the central scenario.
  - The fast-change scenario increases the estimated net benefits compared to the central scenario by between approximately $27 million (Option 1A) and $46 million (Option 1C).
- The fixed 500 kV options (i.e., the 'C' options) continue to provide the greatest net benefit of all options considered on account of these options providing the greatest (and earliest) increase in transfer capacity.
- Market benefits of all options (besides the topology 1 options) are mostly derived from avoided generation and storage costs in the wholesale market (shown by the dark blue section of bars in Figure 12). Avoided fuel costs (red section of bars in Figure 12) and avoided REZ transmission capex (purple section of bars in Figure 12) also contribute significantly to gross wholesale market benefits.
  - As for the central scenario, this scenario finds that avoided/deferred capex is primarily from LS batteries and OCGTs in NSW. By the end of the study period, the model forecasts avoidance of OCGT and pumped hydro as well as more brown coal retirement with Option 3C, while more LS battery, wind and solar capacities are expected to be built.
  - Fuel cost savings are also expected to be mainly due to lower black coal generation in NSW in the early years of the assessment period, followed by lower gas generation later on.
  - REZ transmission capex are also avoided, mainly in 2029 and the mid-2030s, as Option 3C allows builds in REZs with free transmission capacity such as Wagga Wagga and other REZs in South Australia and Victoria to replace installations in REZs that incur transmission build in the base case.

102. AEMO, *2019 forecasting and planning scenarios, inputs, and assumptions*, August 2019, p. 4.

103. The detailed descriptions of the drivers of the key market benefit categories below are based on the market modelling results for Option 3C. Please refer to the accompanying market modelling results, and report, released alongside this PADR for more detail on the market modelling results for all options.

8. Net present value results (continued)

Figure 13 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the fast-change scenario.

Figure 13 – Breakdown of cumulative gross benefits for Option 3C under the fast-change scenario– excluding competition benefits

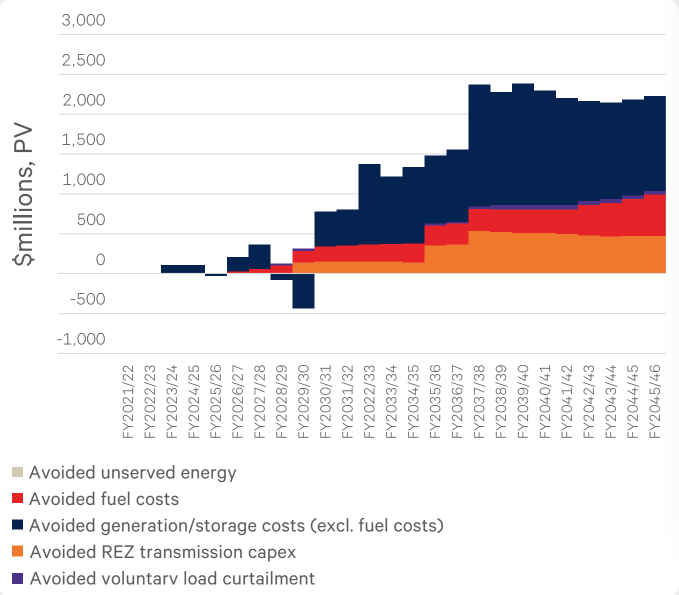


Figure 14 summarises the difference in generation and storage output modelled for Option 3C (in TWh), compared to the base case.

Figure 14 – Difference in output with Option 3C, compared to the base case, under the fast-change scenario

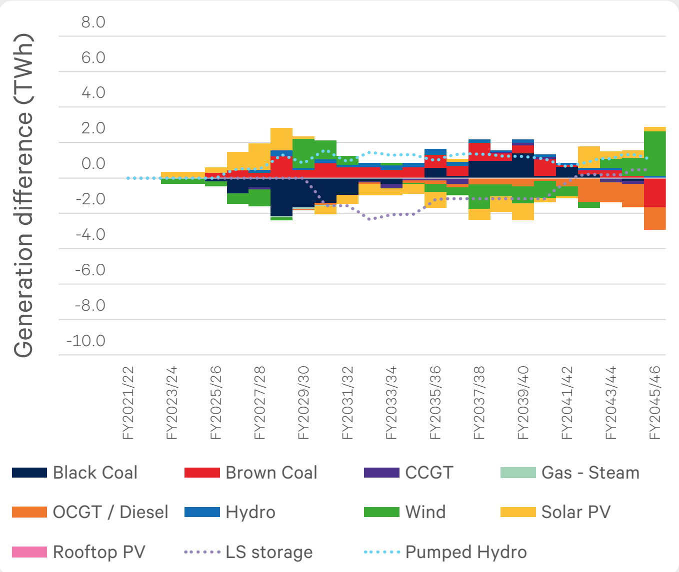
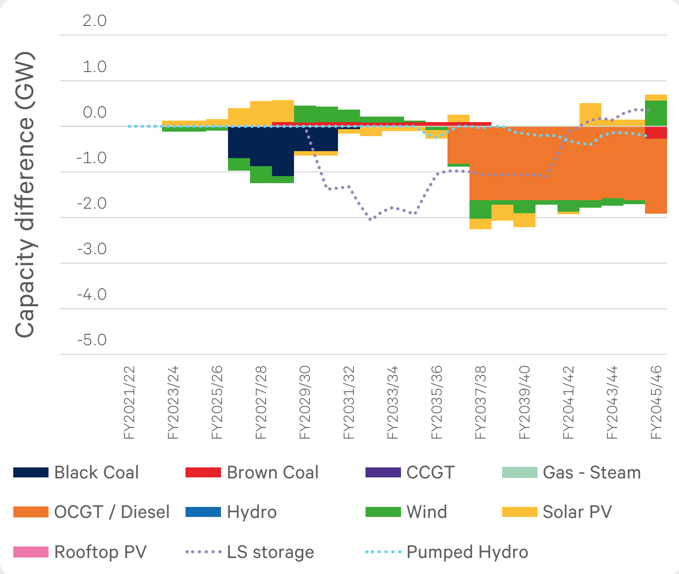


Figure 15 summarises the difference in generation and storage capacity modelled for Option 3C (in GW), compared to the base case.

Figure 15 – Difference in cumulative capacity built with Option 3C, compared to the base case, under the fast-change scenario



8.2.3 Step-change scenario

The step-change scenario reflects a state of the world where there is strong action on climate change and a 'step-change' in emissions, including AEMO's high demand forecasts (including DSP), fast gas and coal price forecasts, coal plants retiring earlier than the central scenario, as well as a restrictive carbon budget.

AEMO describe the step-change scenario as reflecting 'strong action on climate change that leads to a step-change reduction of greenhouse gas emissions. In this scenario, aggressive global decarbonisation leads to faster technological improvements, accelerated exit of existing coal generators, greater electrification of the transport sector with increased infrastructure developments, energy digitalisation, and consumer-led innovation'.[104]

The PACR assessment finds that Option 3C continues to be the top-ranked option under this scenario and is estimated to deliver $634 million in net benefits, while the second-ranked option (Option 2C) has estimated net benefits of $537 million. Under the step-change scenario, the net benefits of all options are found to increase significantly yielding positive expected net benefits, besides Option 1A, Option 1B and Option 2B.

104. AEMO, *2019 forecasting and planning scenarios, inputs, and assumptions*, August 2019, p. 4.

8. Net present value results (continued)

Figure 16 shows the overall estimated net benefit for each option under the step-change scenario.

Figure 16 – Summary of the estimated net benefits under the step-change scenario – excluding competition benefits

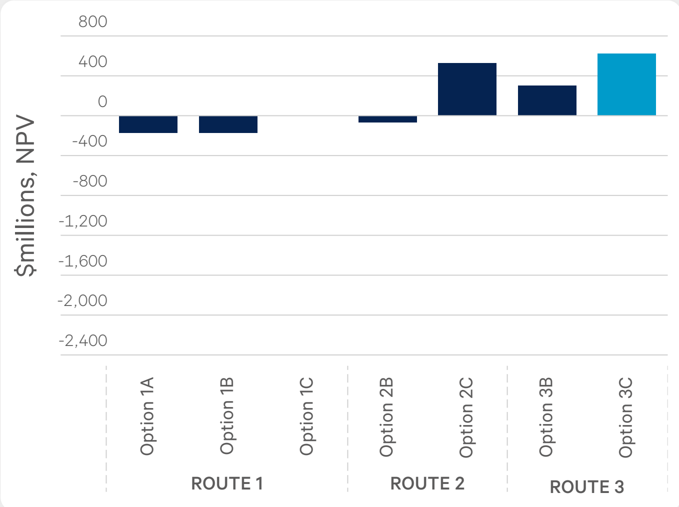
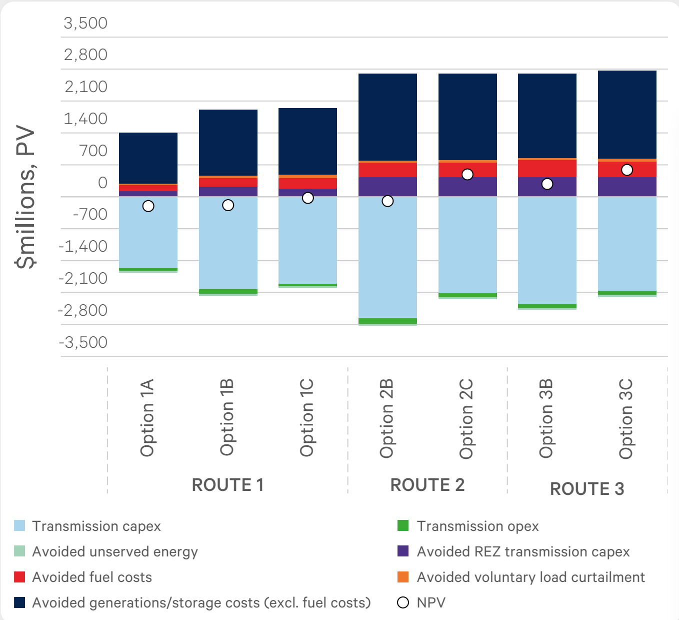


Figure 17 shows the composition of estimated net benefits for each option under the step-change scenario.

Figure 17 – Breakdown of estimated net benefits under the step-change scenario – excluding competition benefits

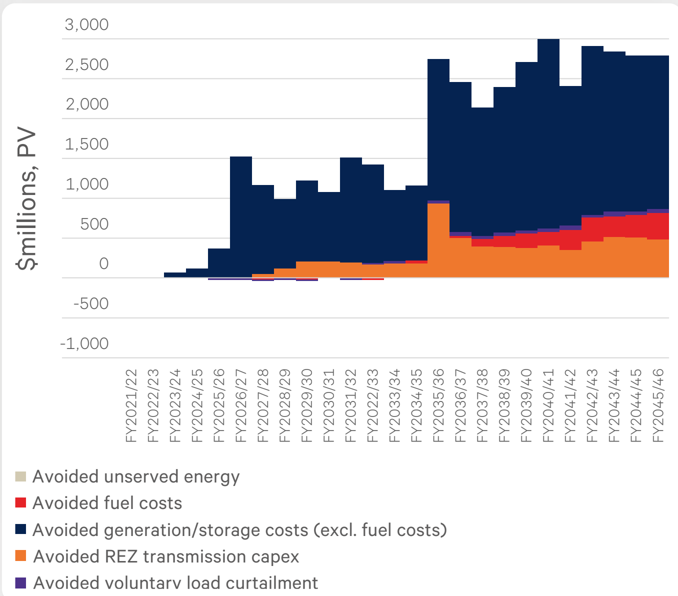


The key findings from the assessment of each option under the step-change scenario (excluding competition benefits) are that:[105]

- The step-change results in greater estimated net benefits for all options than under the central scenario, ranging from approximately $155 million (Option 1A) to $596 million (Option 3B).
- The fixed 500 kV options (i.e., the 'C' options) continue to provide the greatest net benefit within each route considered on account of these options providing the greatest (and earliest) increase in transfer capacity.
- Market benefits of all options are primarily derived from avoided generation and storage costs (shown by the dark blue section of bars in Figure 17) and are expected to accrue as soon as HumeLink is commissioned and then significantly increase from around 2035/36.
  - These benefits are found to be most significant around the time large black coal generators are expected to retire and are initially driven by an increased utilisation of Snowy 2.0 and changes in capacity mix that result in the avoidance of LS battery build in New South Wales from 2026/27.
  - The forecast capex savings from the mid-2030s are mostly driven by the deferral/avoidance of solar investment followed by the avoidance of OCGT installations, with some wind build forecast to be brought forward (however, the reduced wind build in Queensland in the 2040s is offset by the additional wind installation in southern states, particularly Victoria, in those years).
- Avoided or deferred REZ transmission capex is the second most material category of market benefit estimated across the options (shown by the purple section of bars in Figure 17).
  - These benefits start from 2027/28 as wind and solar installations are forecast to be built in Wagga Wagga and South Australia instead of the Central West Orana REZ and Queensland, avoiding transmission costs.
- Fuel cost savings are expected to be lower than for the central scenario, mainly due to higher coal retirements in the step-change scenario.
  - The modelled fuel cost savings start from the late 2030s, where gas generation is avoided.

Figure 18 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the step-change scenario.

Figure 18 – Breakdown of cumulative gross benefits for Option 3C under the step-change scenario – excluding competition benefits



105. The detailed descriptions of the drivers of the key market benefit categories below are based on the market modelling results for Option 3C. Please refer to the accompanying market modelling results, and report, released alongside this PADR for more detail on the market modelling results for all options.

8. Net present value results (continued)

Figure 19 summarises the difference in generation and storage output modelled for Option 3C (in TWh), compared to the base case.

Figure 19 – Difference in output with Option 3C, compared to the base case, under the step-change scenario

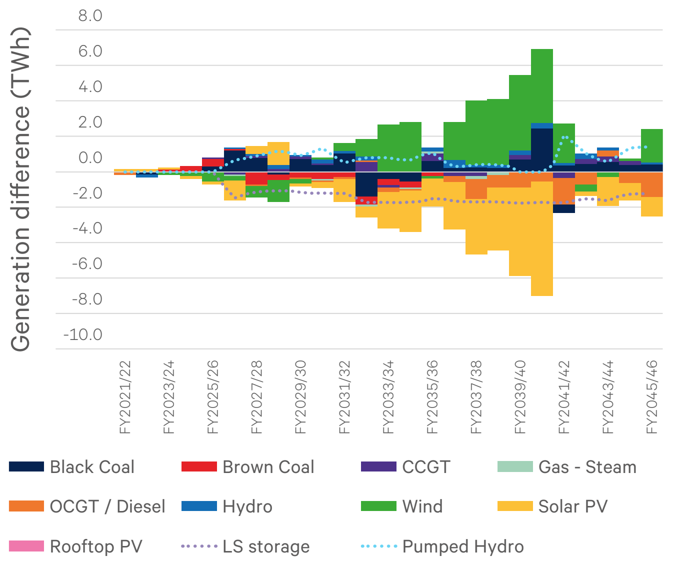
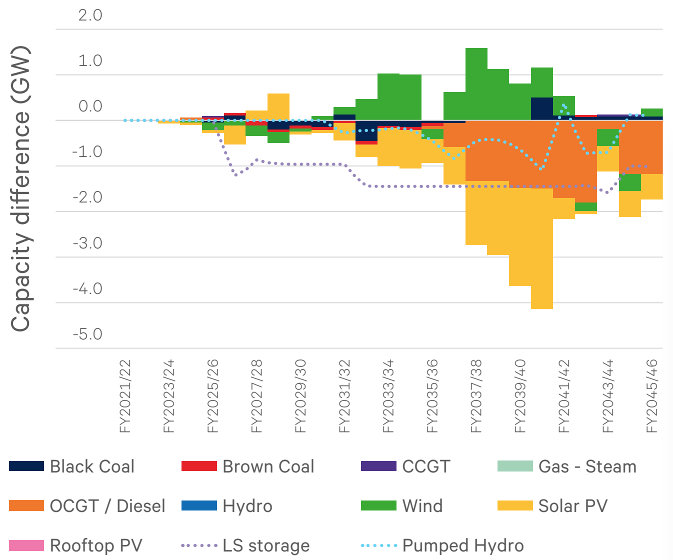


Figure 20 summarises the difference in generation and storage capacity modelled for Option 3C (in GW), compared to the base case.

Figure 20 – Difference in cumulative capacity built with Option 3C, compared to the base case, under the step-change scenario



8.2.4 Slow-change scenario

The slow-change scenario is made up of a set of conservative assumptions reflecting a future world of lower demand forecasts (including DSP), slow gas and coal price forecasts and coal plants allowed a ten-year life extension (if economic to do so). While the slow-change scenario assumes the same national emissions reduction as the central scenario by 2030, it assumes lower state-based renewables commitments. The slow-change scenario also excludes VNI West going ahead.

AEMO describe the slow-change scenario as reflecting 'a general slow-down of the energy transition. It is characterised by slower advancements in technology and reductions in technology costs, low population growth, and low political, commercial, and consumer motivation to make the upfront investments required for significant emissions reduction'.[106]

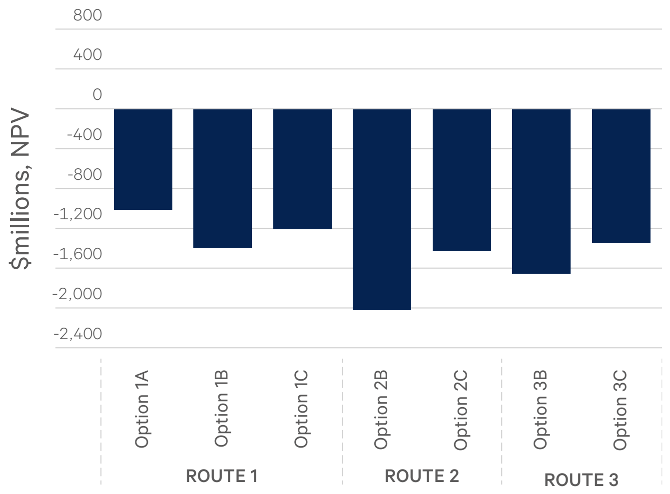
The slow-change scenario is therefore intended to represent the lower end of the potential range of realistic net benefits associated with the various options.

We note that the slow-change scenario is considered the least likely of the four scenarios and is given a 10 per cent weighting in the analysis, consistent with the recommended weighting in the 2020 ISP.[107] In addition, we note that recent commentary from the ESB[108] suggests that the NEM is in fact tracking closest to the step-change currently.[109]

All options are found to have significantly negative net benefits under the slow-change scenario. Option 1A is found to have the least negative net benefits at around -$1,011 million. Option 3C is the third ranked option with an estimated negative net market cost that is approximately 32 per cent greater than Option 1A.

Figure 21 shows the overall estimated net benefit for each option under the slow-change scenario.

Figure 21 – Summary of the estimated net benefits under the slow-change scenario – excluding competition benefits



106. AEMO, *2019 forecasting and planning scenarios, inputs, and assumptions*, August 2019, p. 3.

107. AEMO, *2020 Integrated System Plan*, July 2020, p. 86

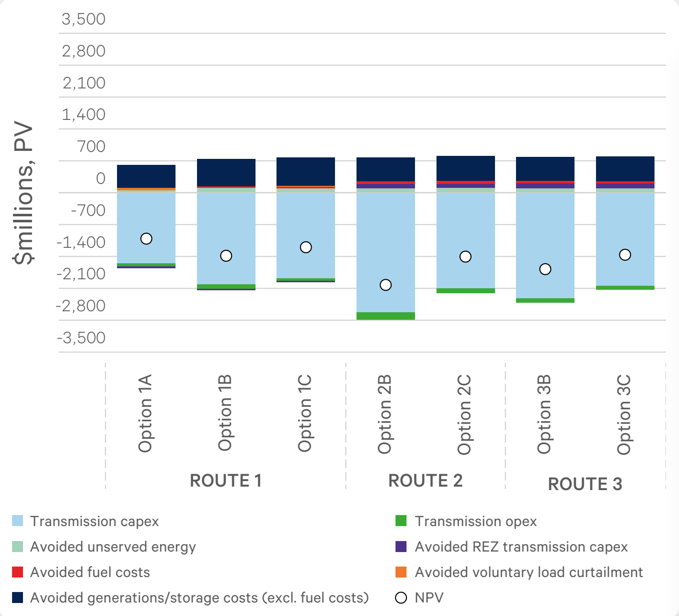
108. See Renew Economy, "We are headed for step change:" ESB's Kerry Schott on new market design, Parkinson, G., 30 September 2020 (accessed via https://reneweconomy.com.au/we-are-headed-for-step-change-esbs-kerry-schott-on-new-market-design-89487/ on 7 July 2021), Argus Media, Australia tops step-change energy transition scenario, Morrison, K., 7 May 2021 (accessed via https://www.argusmedia.com/en/news/2212777-australia-tops-stepchange-energy-transition-scenario on 7 July 2021) & ESB, The Health of the National Electricity Market 2020, Volume 1: The ESB Health of the NEM Report, 5 January 2020, p. 8.

109. We have investigated the impact of this via a sensitivity, in section 8.4.4, that applies a higher weight to the step-change scenario in-line with this recent commentary.

8. Net present value results (continued)

Figure 22 shows the composition of estimated net benefits for each option under the slow-change scenario.

Figure 22 – Breakdown of estimated net benefits under the slow-change scenario – excluding competition benefits



The key findings from the assessment of each option under the slow-change scenario (excluding competition benefits) are that:[110]

- The estimated net market benefits for all options fall significantly relative to the central scenario (and are all negative).
- The fixed 500 kV options (i.e., the 'C' options) continue to provide the greatest net benefit (least net cost) of all options considered that are able to operate at 500 kV on account of these options providing the greatest (and earliest) increase in transfer capacity.
  - A key exception to this is the one 330 kV option assessed (Option 1A), which has the greatest estimated net benefit (least net cost) of all options considered on account of its low costs.
- The flexible 500 kV options are found to be upgraded from 330 kV to 500 kV in 2035-36, being the time at which the benefits from upgrading to 500 kV exceed the annualised upgrade cost under this scenario.
- The market benefits for all options are almost completely driven by avoided or deferred costs associated with generation and storage (shown by the dark blue bars in Figure 22).
  - The market modelling finds that this is driven primarily by avoided LS battery investment in New South Wales from around 2032/33.
  - Other wholesale market benefit categories are found to be of a smaller scale under the slow scenario than the other scenarios.
  - Overall, due to the low demand and assumptions regarding the NSW Roadmap in this scenario as well as life extension of coal plants, HumeLink is forecast to have significantly lower market benefits as compared to the other scenarios.

Figure 23 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the slow-change scenario. It shows that the majority of the overall benefits have accrued by 2032-33 under this scenario.

Figure 23 – Breakdown of cumulative gross benefits for Option 3C under the slow-change scenario – excluding competition benefits

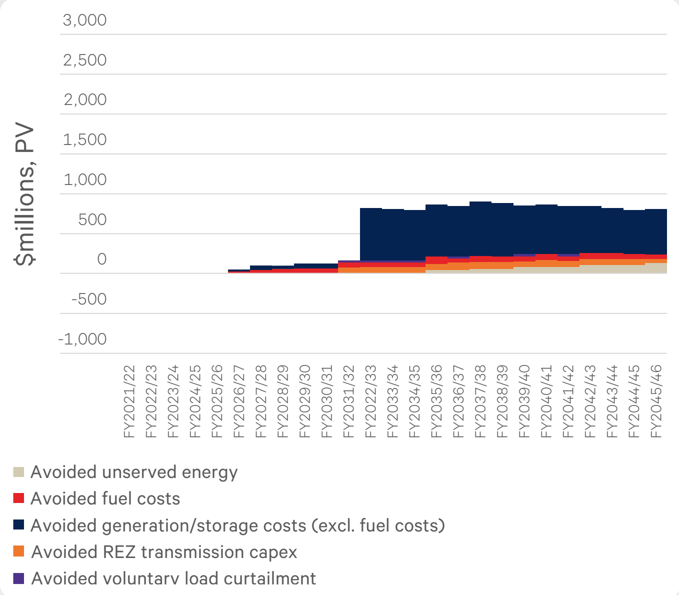
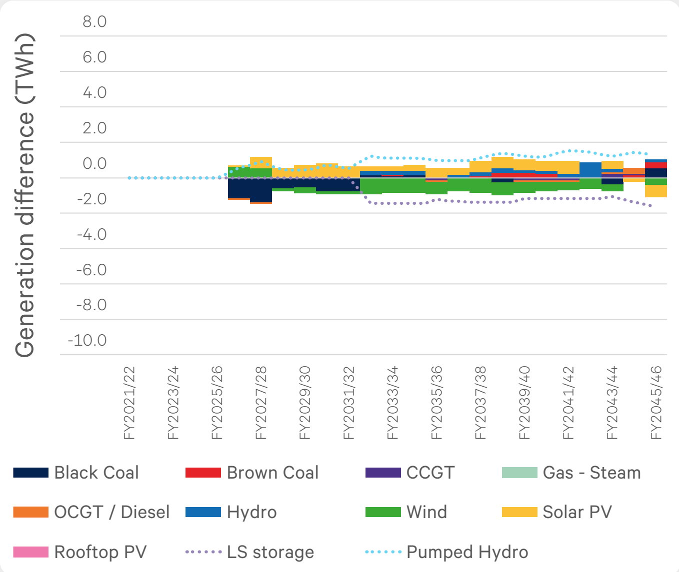


Figure 24 summarises the difference in generation and storage output modelled for Option 3C (in TWh), compared to the base case.

Figure 24 – Difference in output with Option 3C, compared to the base case, under the slow-change scenario

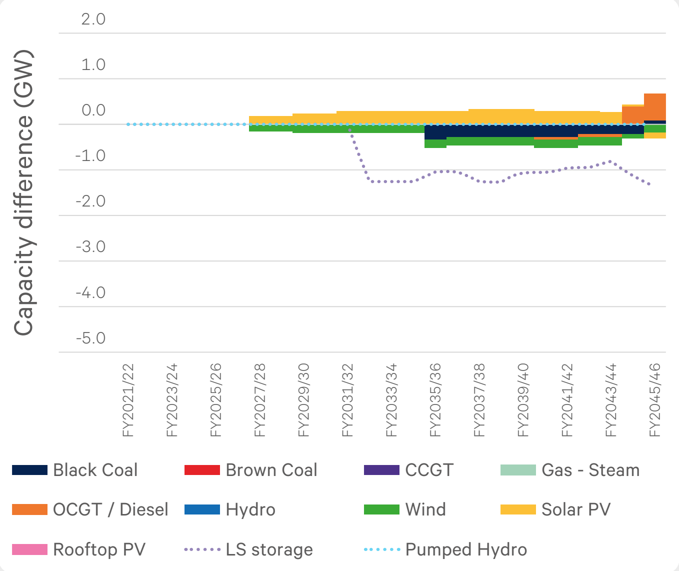


110. The detailed descriptions of the drivers of the key market benefit categories below are based on the market modelling results for Option 3C. Please refer to the accompanying market modelling results, and report, released alongside this PADR for more detail on the market modelling results for all options.

8. Net present value results (continued)

Figure 25 summarises the difference in generation and storage capacity modelled for Option 3C (in GW), compared to the base case.

Figure 25 – Difference in cumulative capacity built with Option 3C, compared to the base case, under the slow-change scenario

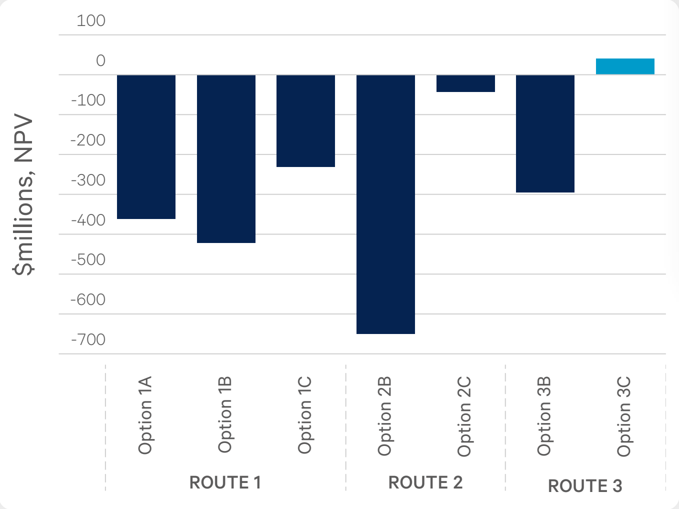


8.2.5 Weighted net benefits

Figure 26 shows the estimated net benefits for each of the credible options weighted equally across the four scenarios investigated (and discussed above).

On a weighted-basis, Option 3C is the top-ranked option and is expected to deliver approximately $39 million in net benefits (excluding competition benefits), which is around $83 million more net benefits than the second-ranked option (Option 2C) in present value terms.

Figure 26 – Summary of the estimated net benefits, weighted across the four scenarios – excluding competition benefits



The top two ranked options (i.e., Option 2C and Option 3C) are assessed further in section 8.3 below.

8.3 RIT-T RESULTS

This section presents the RIT-T assessment for the PACR. Specifically, it builds upon the positioning assessment discussed above by presenting the net market benefits for the two top-ranked options coming out of that analysis (i.e., Option 2C and Option 3C), across each of the four ISP scenarios investigated, as well as capturing the eighth category of market benefits estimated for these options, i.e. competition benefits.

The seven market benefits estimated for each option in section 8.1 above remain unchanged in this section. We therefore do not repeat the discussion of these for each scenario but, instead, focus the discussion of the new category of market benefit captured in this assessment, i.e., competition benefits.

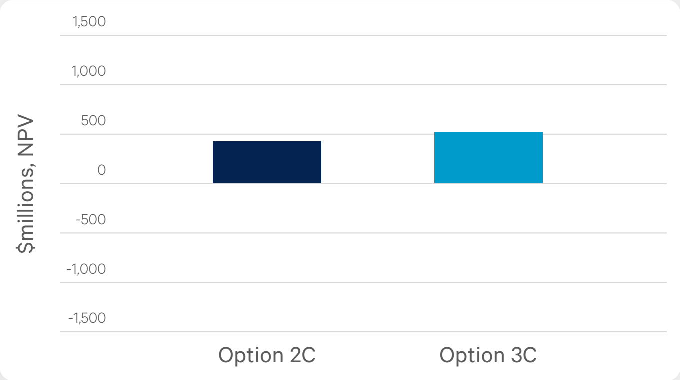
8.3.1 Central scenario

Both of the options are found to deliver strongly positive net benefits, under the central scenario, ranging from $431 million to $520 million in present value terms. Overall, Option 3C continues to be the top-ranked option with estimated net benefits that are approximately 21 per cent greater than the second-ranked option (Option 2C).

Competition benefits add significantly to each option's estimated net benefits (between $464 million and $471 million across the options), which is approximately 18 per cent of their estimated gross wholesale market benefits for both options.

Figure 27 shows the overall estimated net benefit for each option under the central scenario. The 'core net benefits' shown in this chart (and all charts of this nature in this section), are the net benefits estimated in section 8.1 above, i.e., the net benefits factoring in the seven categories of market benefit estimated as part of the positioning assessment and the option costs.

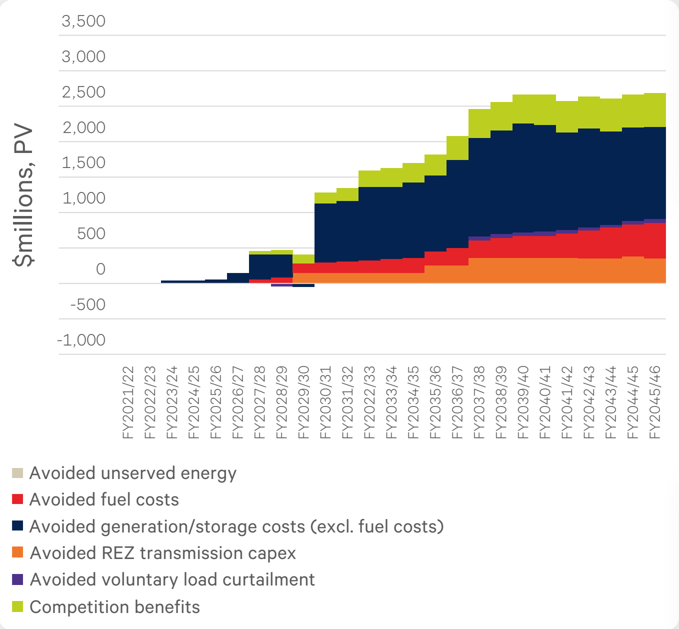
Figure 27 – Summary of the estimated net benefits under the central scenario – including competition benefits



8. Net present value results (continued)

Figure 28 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the central scenario. It shows the cumulative market benefits, in present value terms (and so the final year's stacked bars align with the overall breakdown of estimated market benefits shown in Figure 27 above). This figure, and all figures of this nature in section 8.3, update the corresponding figures in section 8.2 to include the estimated competition benefits.

Figure 28 – Breakdown of cumulative gross benefits for Option 3C under the central scenario – including competition benefits



Competition benefits are expected to accrue from shortly after Option 3C is commissioned and are material across the assessment period, ultimately contributing 18 per cent of the total expected gross benefits. Under this scenario, around 59 per cent of the competition benefits are comprised of wholesale market cost savings with the remainder made up of demand response benefits.

8.3.2 Fast-change scenario

Each of the options is found to deliver strongly positive net benefits under the fast-change scenario, ranging from $394 million to $487 million in present value terms. Overall, Option 3C is the top-ranked option with estimated net benefits that are approximately 24 per cent greater than the second-ranked option (Option 2C).

Competition benefits add significantly to each option's estimated net benefits (between $384 million and $396 million across the options), which is approximately 15 per cent of their estimated gross benefits for both options.

Figure 29 shows the overall estimated net benefit for each option under the fast-change scenario.

Figure 29 – Summary of the estimated net benefits under the fast-change scenario – including competition benefits

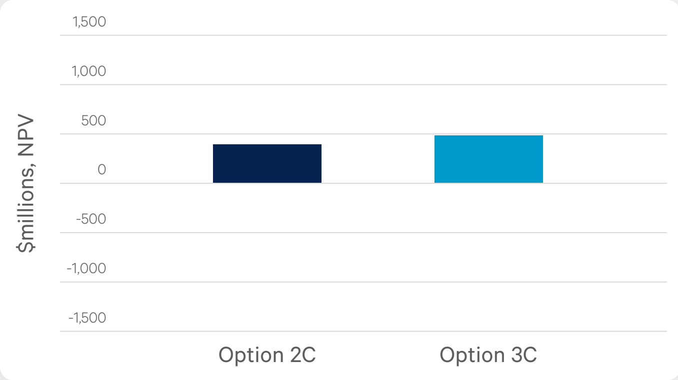
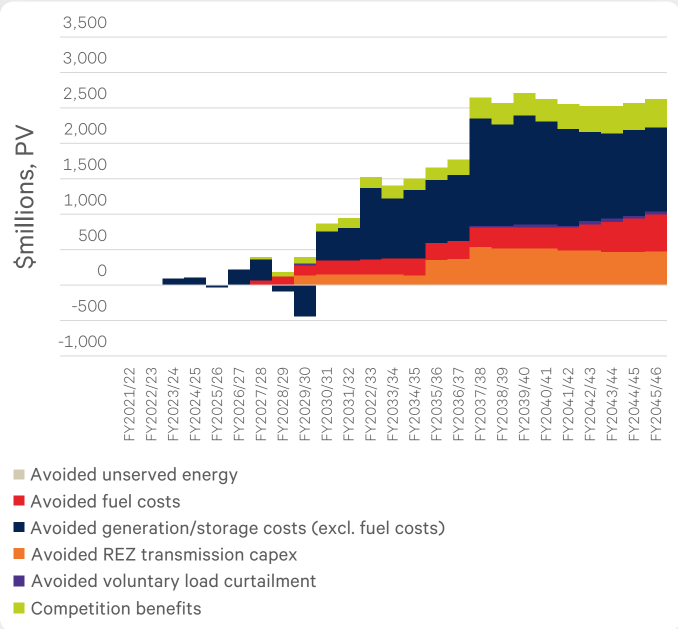


Figure 30 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the fast-change scenario. It shows the cumulative market benefits, in present value terms (and so the final year's stacked bars align with the overall breakdown of estimated market benefits shown in Figure 29 above).

Figure 30 – Breakdown of cumulative gross benefits for Option 3C under the fast-change scenario – including competition benefits



Competition benefits are expected from shortly after Option 3C is commissioned and are material across the assessment period, ultimately contributing 15 per cent of the total expected gross benefits. Under this scenario, around 48 per cent of the competition benefits are comprised of wholesale market cost savings with the remainder made up of demand response benefits.

8. Net present value results (continued)

8.3.3 Step-change scenario

Each of the options is found to deliver strongly positive net benefits under the step-change scenario, ranging from $1,168 million to $1,271 million in present value terms. Overall, Option 3C is the top-ranked option with estimated net benefits that are approximately 9 per cent greater than the second-ranked option (Option 2C).

Competition benefits add significantly to each option's estimated net benefits (between $631 million and $637 million across the options), which is approximately 19 per cent of their estimated gross benefits for both options.

Figure 31 shows the overall estimated net benefit for each option under the step-change scenario.

Figure 31 – Summary of the estimated net benefits under the step-change scenario – including competition benefits

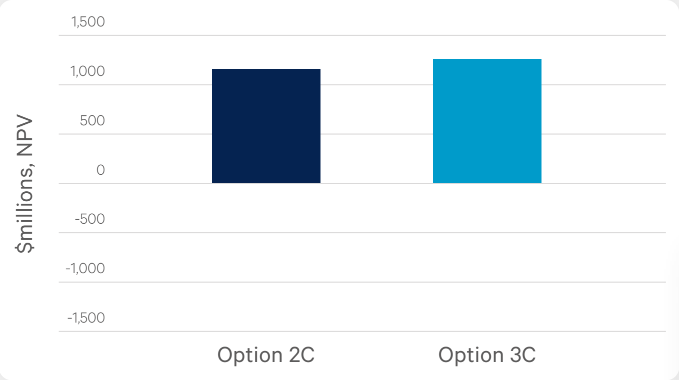
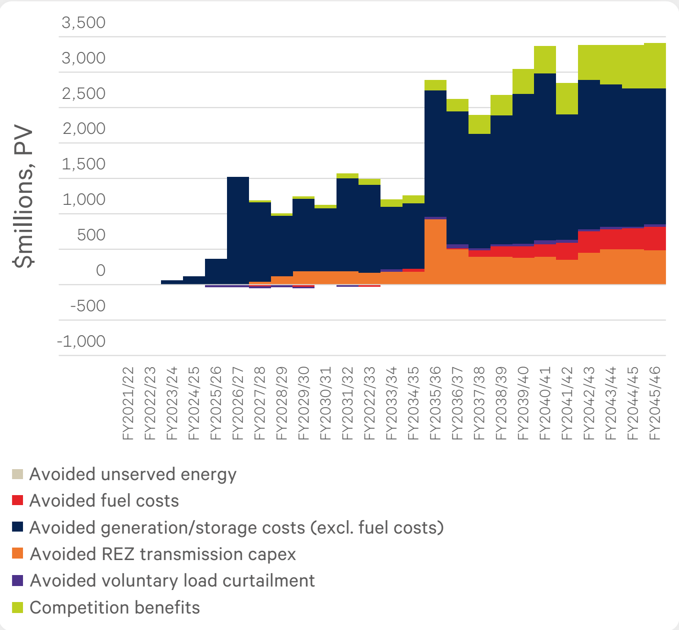


Figure 32 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the step-change scenario. It shows the cumulative market benefits, in present value terms (and so the final year's stacked bars align with the overall breakdown of estimated market benefits shown in Figure 31 above).

Figure 32 – Breakdown of cumulative gross benefits for Option 3C under the step-change scenario – including competition benefits



Competition benefits do not appear until later in the period under the step-change scenario, compared to the central and fast-change scenarios, but are material by the end of the assessment period, ultimately contributing 19 per cent of the total expected gross benefits. Under this scenario, almost all of the competition benefits are made up of demand response benefits (92 per cent), with wholesale market cost savings making up the remainder.

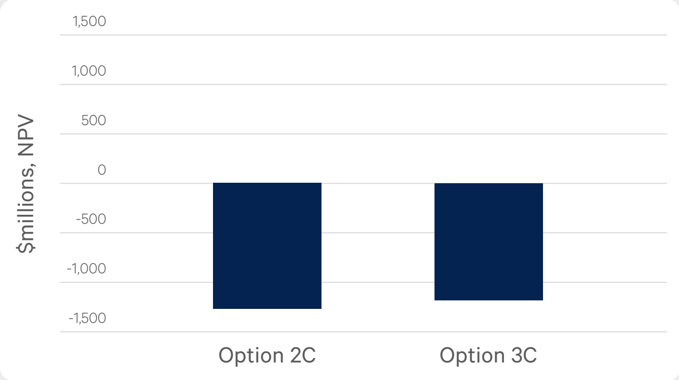
8.3.4 Slow-change scenario

None of the options is found to deliver a positive net benefit under the slow-change scenario, even once competition benefits are included, with negative net benefits (net costs) ranging from -$1,253 million to -$1,177 million in present value terms. Overall, Option 3C is the top-ranked option with estimated net costs that are approximately 6 per cent lower than the second-ranked option (Option 2C).

Competition benefits add to each option's estimated net benefits (between $160 million and $163 million for Option 2C and Option 3C respectively), which is approximately 17 per cent of estimated gross benefits for both options.

Figure 33 shows the overall estimated net benefit for each option under the slow-change scenario.

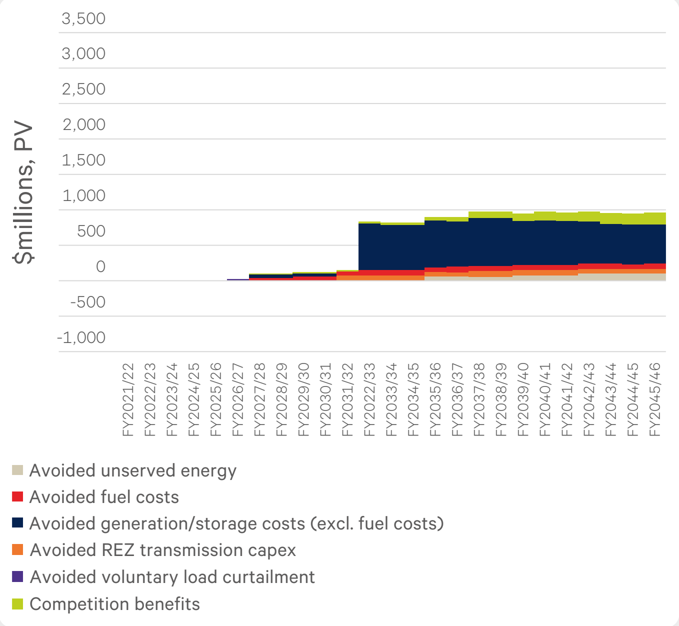
Figure 33 – Summary of the estimated net benefits under the slow-change scenario – including competition benefits



8. Net present value results (continued)

Figure 34 below presents the estimated cumulative expected gross benefits for Option 3C for each year of the assessment period under the slow-change scenario. It shows the cumulative market benefits, in present value terms (and so the final year's stacked bars align with the overall breakdown of estimated market benefits shown in Figure 33 above).

Figure 34 – Breakdown of cumulative gross benefits for Option 3C under the slow-change scenario – including competition benefits



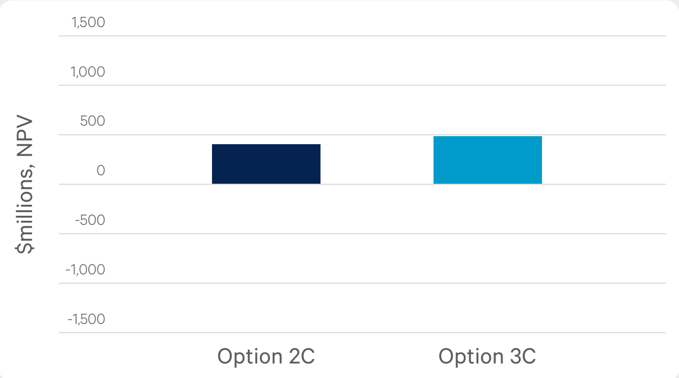
Competition benefits, along with all benefits, are much lower under the slow-change scenario compared to the other three scenarios. They appear from around midway through the period and remain constant from then, ultimately contributing 17 per cent of the total expected gross benefits. Under this scenario, around 49 per cent of the competition benefits are comprised of wholesale market cost savings with the remainder made up of demand response benefits.

8.3.5 Weighted net benefits

Figure 35 shows the estimated net benefits for each of the credible options weighted across the four scenarios according to weights set out in section 6.2.

On a weighted-basis, Option 3C is the top-ranked option and is expected to deliver approximately $491 million in net benefits, which is around 23 per cent greater net benefits than the second-ranked option (Option 2C).

Figure 35 – Summary of the estimated net benefits, weighted across the four scenarios – including competition benefits



8.4 SENSITIVITY ANALYSIS

A range of sensitivity analyses have been undertaken to test the robustness of the PACR modelling outcomes.

Specifically, we have assessed a number of sensitivities that involve additional market modelling, namely:

- the impact of the recently announced new Kurri Kurri and Tallawarra B gas generators;
- delaying VNI West until 2035/36 (in-line with the core 2020 ISP assumption for the central scenario);
- whether adding the MPFC solution proposed by Smart Wires would increase the expected net benefits of the preferred option; and
- the impact on the positioning analysis of adopting the draft 2021 IASR assumptions.

Each of these sensitivity tests has been designed to test the robustness of the net benefit outcomes for Option 3C. The market modelling for each of the above sensitivities has not been undertaken for all credible options and scenarios. This is due to the computational time required to complete such an exercise and the fact that the four core scenarios outlined in the sections above already include significant variability in the underlying assumptions and find that Option 3C is the top-ranked option.

Three other sensitivity tests that do not require wholesale market modelling have also been investigated, namely adopting:

- higher weighting of the step-change scenario, in-line with recent commentary from the ESB;
- higher and lower network capital costs of the credible options (including the adoption of P90 costs); and
- alternate commercial discount rate assumptions.

Each of the sensitivity tests are discussed below.

8.4.1 Impact of the recently announced new Kurri Kurri and Tallawarra B gas generators

In early May 2021, there were two announcements regarding Federal Government funding for new gas-fired generators in NSW. Namely:

- on 3 May 2021, EnergyAustralia announced it would build the 316 MW Tallawarra B gas-hydrogen plant with $83 million in Government support;[111] and
- on 18 May 2021, the Federal Government announced it will spend up to $600 million to build a new 660 MW gas plant at Kurri Kurri in NSW.[112]

These developments are not reflected in our wholesale market modelling assumptions, which are based on the 2020 ISP. However we have considered the impact that these two developments would have on the expected net benefits of Options 3C and 2C.

Under the central scenario, we find that the estimated net benefits of Option 3C decrease by around 36 per cent assuming the new Kurri Kurri and Tallawarra B gas generators are commissioned. However, overall Option 3C continues to provide substantial positive net market benefits. We find that Option 3C still delivers approximately $334 million in net benefits. Option 3C is around 36 per cent higher in net benefits than the second-ranked option (Option 2C).

111. https://www.nsw.gov.au/media-releases/australias-first-green-hydrogen-and-gas-power-plant
112. https://www.minister.industry.gov.au/ministers/taylor/media-releases/protecting-families-and-businesses-higher-energy-prices

8. Net present value results (continued)

Figure 36 shows the overall estimated net benefit for each option under this sensitivity, as well as under the RIT-T outcome (i.e., the net benefits estimated in section 8.3 above).

Figure 36 – Net benefits assuming the new Kurri Kurri and Tallawarra B gas generators – including competition benefits

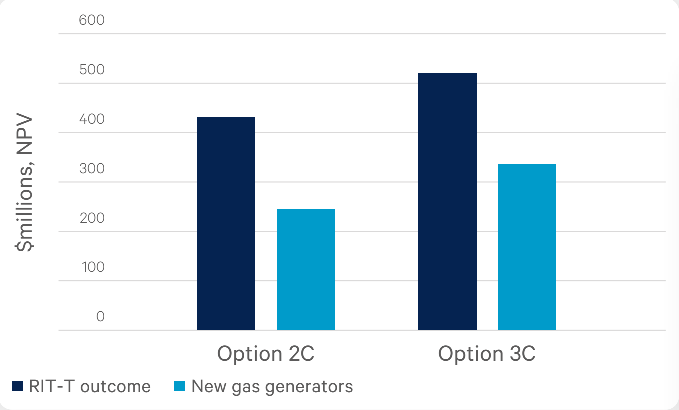
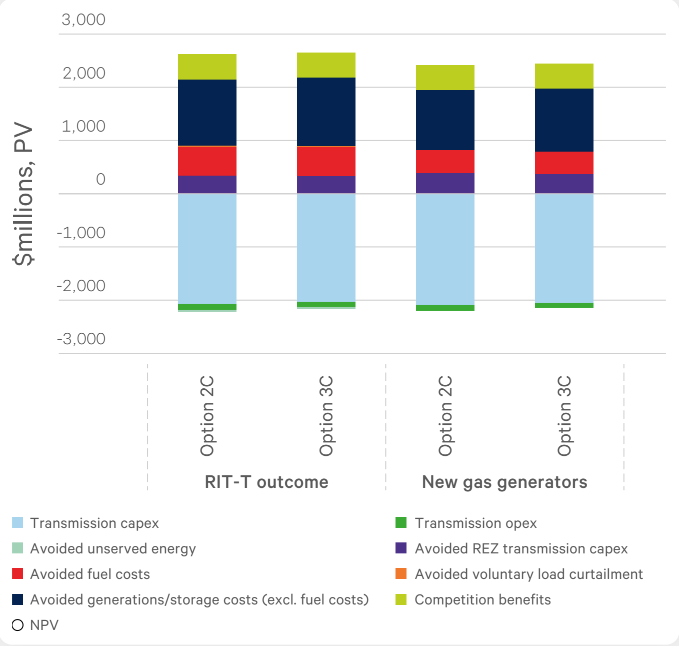


Figure 37 breaks down the estimated net benefits under core RIT-T outcome (i.e., the net benefits estimated in section 8.3 above) on the left-hand side and assuming the new gas generators on the right-hand side. The largest reduction in estimated benefits for the preferred option is found to come from avoided generation/storage costs (shown in dark blue below).

Figure 37 – Breakdown of estimated net benefits assuming with and without the new Kurri Kurri and Tallawarra B gas generators



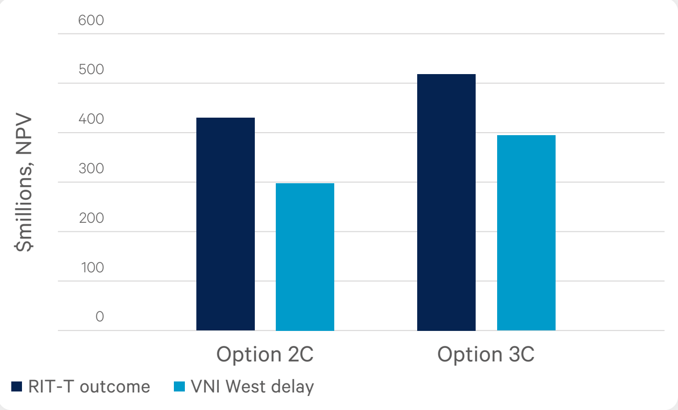
8.4.2 Impact of the assumed timing for VNI West

Our wholesale market modelling is based on an assumed commissioning date for VNI West of 2028/29. This is based on AEMO's 2020 ISP accelerated delivery date for VNI West and our current view of the earliest commissioning date for this investment. However, we have investigated the impact of delaying the commissioning date of VNI West to until 2035/36, in-line with the 2020 ISP core assumption for the central scenario.

Under the central scenario, we find that the estimated net benefits of Option 3C decreases by around 24 per cent if it is assumed that VNI West is delayed until 2035/36 (from the core assumption of 2028/29). Option 3C is around 33 per cent higher in net benefits than the second-ranked option (Option 2C).

Figure 38 shows the overall estimated net benefit for each option under this sensitivity, as well as under the RIT-T assessment.

Figure 38 – Net benefits assuming VNI West is delayed until 2035/36 – including competition benefits



8.4.3 Expected impact of MPFC

We have considered whether MPFC can add to the expected net benefits of the preferred option, in response to the submission from Smart Wires.

Under the central scenario, we find that the estimated net benefits of Option 3C decrease by $7 million assuming it is coupled with the MPFC solution proposed by Smart Wires (under these assumptions, Option 3C is found to deliver approximately $513 million in net benefits). Consequently, we find that the cost of providing additional capacity through MPFC are not outweighed by the additional expected market benefits at this point in time.

8.4.4 Alternate weighting of the scenarios in-line with recent commentary

We have investigated the effects of assuming alternate scenario weightings based on more recent information than the 2020 ISP. Specifically, and informed by ESB commentary that the NEM is on step-change scenario, we have applied the following scenario weightings as part of this sensitivity:

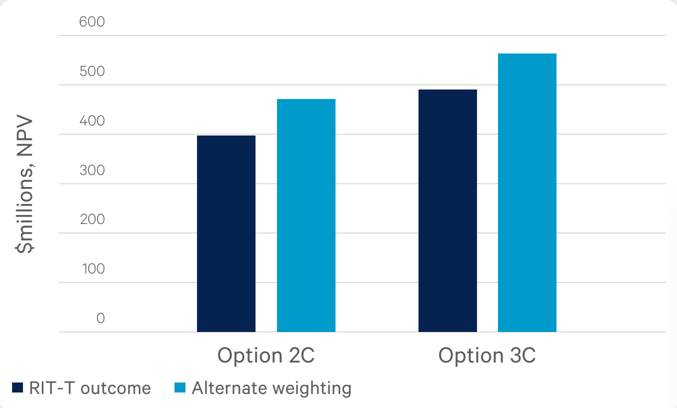
- 30 per cent to the central scenario (i.e., a decrease of 10 per cent);
- 30 per cent to the fast-change scenario;
- 30 per cent to the step-change scenario (i.e., an increase of 10 per cent); and
- 10 per cent to the slow-change scenario.

We find that the estimated net benefits of Option 3C increase by around 15 per cent under these assumed weightings compared to the weightings for HumeLink set out in the 2020 ISP. Under these weightings, Option 3C is found to deliver $566 million in net benefits on a weighted basis, which is approximately $93 million greater than the second-ranked option (Option 2C).

8. Net present value results (continued)

Figure 39 shows the overall estimated net benefit for each option under this sensitivity, as well as under the ISP weightings.

Figure 39 – Net benefits assuming alternate scenario weightings – including competition benefits

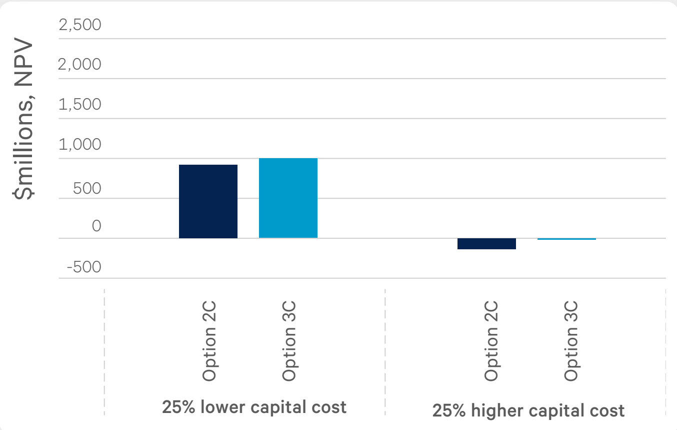


8.4.5 Higher and lower network capital costs of the credible options

We have tested the sensitivity of the results to the underlying network capital costs of the credible options.

Figure 40 shows that Option 3C remains the top-ranked credible option if the capital cost assumptions are varied by 25 per cent (higher or lower) across both options. Under the assumption of 25% lower capital costs, the net benefits of Option 3C increase to $999 million. However, under the 25 per cent higher assumed capital costs, Option 3C is found to have negative net benefits of -$17 million for Option 3C.

Figure 40 – Impact of 25 per cent higher and lower network capital costs, weighted NPVs – including competition benefits

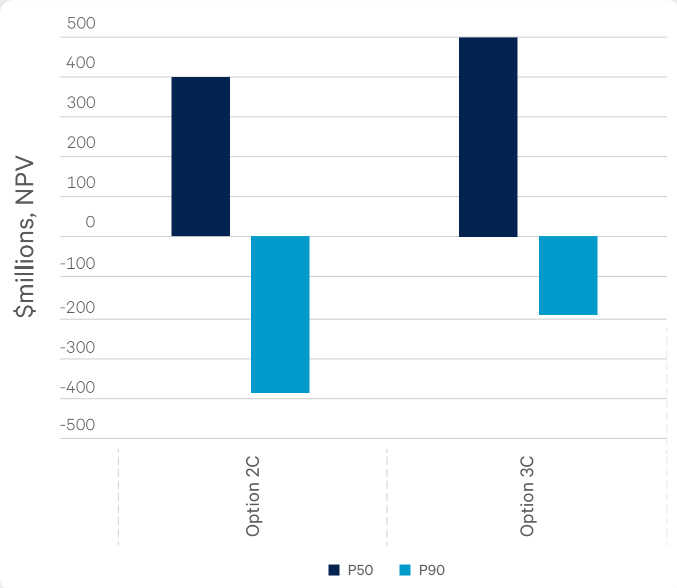


We find that if Option 3C's capital costs are more than 24 per cent higher than the central estimates, it would no longer have positive estimated net benefits (on a weighted-basis). We also find that if Option 2Cs costs were to remain constant, Option 3C's costs would need to increase by more than 4 per cent for Option 2C to become preferred.

There is currently a high degree of uncertainty in relation to the accuracy of the capital cost estimates (which are 'class 4' estimates), consistent with the stage that the project is currently at. We also note that a substantial proportion of the costs of HumeLink will relate to biodiversity offset costs, which are determined by external processes.

For completeness, we have also considered alternate 'P90' capex estimates, which are higher than the P50 estimates used in the main RIT-T analysis, and allow for additional contingencies. Specifically, the P90 capex estimates have an expected 90 per cent probability of cost underrun, while the P50 capex estimates have a 50 per cent expected probability of cost underrun. Figure 41 shows that both options have significantly negative weighted net benefits under P90 capex estimates (with the preferred option expected to result in a net cost of approximately $193 million).

Figure 41 – P50 capex estimates compared to P90 capex estimates, weighted NPVs – including competition benefits



We will be undertaking further detailed analysis in relation to the costs of the preferred option as part of progressing this project, following the initial CPA. Any increase in the estimated costs of the project resulting from this analysis would result in AEMO needing to issue a 'feedback loop' confirmation that the project remains consistent with the ISP optimal development path, before we could lodge a further CPA. Consumers can therefore have confidence that any increase in the cost estimate for the preferred option will only result in the project proceeding if AEMO confirms that it remains part of the ISP at the higher cost.

8.4.6 Alternate commercial discount rate assumptions

Figure 42 illustrates the sensitivity of the results to adopting different discount rate assumptions in the NPV assessment. In particular, it illustrates the impact of adopting:

- a high discount rate of 7.90 per cent; and
- a low discount rate of 2.23 per cent.

Option 3C is the top-ranked option under both alternate assumptions and continues to deliver positive net benefits, albeit only marginally under the high discount rate assumption. We consider that a discount rate of 7.90 per cent is at the extreme end for commercial discount rates today, and note that the draft 2021 IASR assumptions propose a 4.80 per cent discount rate as part of the central scenario (which is lower than our assumed central rate of 5.90 per cent).

8. Net present value results (continued)

Figure 42 – Impact of different assumed discount rates, weighted NPVs – including competition benefits

We have extended this sensitivity and find a discount rate that is higher than 7.98 per cent would result in Option 3C having a negative estimated net benefit.

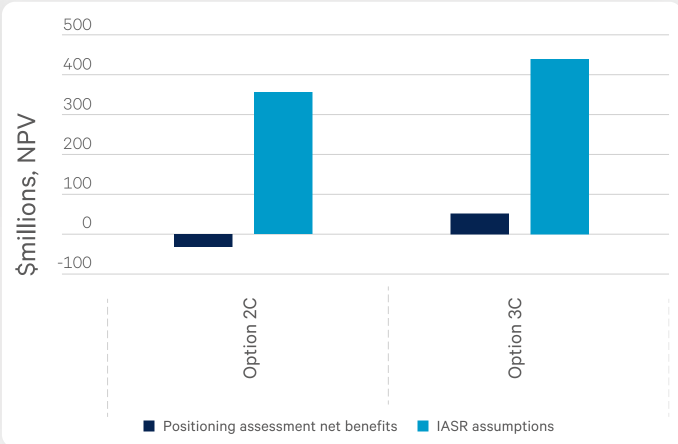
8.4.7 Adopting AEMO's draft 2021 IASR assumptions

This sensitivity reapplies the positioning assessment to the two top-ranked options, adopting the draft 2021 IASR assumptions published by AEMO in December 2020.[113] It provides insight into the possible outcomes of the forthcoming 'feedback loop' assessment if AEMO adopts the final 2021 IASR assumptions (due to be published by the end of July 2021) for this analysis. We consider that adopting the most recently consulted upon final IASR assumptions, which will underpin the 2022 ISP, in applying the feedback loop would be consistent with the objectives of the overall actionable ISP framework.

Under the central scenario, we find that the estimated net benefits under the positioning assessment for Option 3C increase significantly using the draft 2021 IASR assumptions, and becomes substantially positive. Under the draft 2021 IASR assumptions, Option 3C is found to deliver approximately $436 million in net benefits. Option 3C has around 22 per cent greater net benefits than the second-ranked option (Option 2C) under draft 2021 IASR assumptions.

Figure 43 shows the overall estimated net benefit for each option under this sensitivity, as well as under the 'positioning assessment net benefits' (i.e., the net benefits estimated in section 8.3 above, which excludes competition benefits).

Figure 43 – Net benefits under the central scenario adopting AEMO's draft 2021 IASR assumptions – excluding competition benefits



It is important to note that the net benefits shown above do not include competition benefits. The analysis in this PACR demonstrates that competition benefits are material for this RIT-T (as illustrated in section 8.3). Including competition benefits alongside the 2021 IASR assumptions can therefore be expected to further increase the net benefits of both Option 2C and Option 3C. We anticipate that AEMO will need to consider competition benefits in applying the feedback loop to HumeLink.

113. AEMO, Draft 2021 Inputs Assumptions and Scenarios Report (IASR), 17 December 2020.

Conclusion

This PACR finds that Option 3C, involving new 500 kV double-circuit lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby is expected to deliver approximately $491 million in net benefits over the assessment period (on a weighted-basis) and is the preferred option identified under this RIT-T. Option 3C is found to have approximately 23 per cent greater estimated net benefits than the second ranked option (Option 2C).

The high level scope of Option 3C includes:

- a new Wagga Wagga 500/330 kV substation and a 330 kV connection to the existing Wagga Wagga substation;
- construction of three 500 kV transmission lines:
  - between Maragle and Bannaby 500 kV substation;
  - between Maragle and Wagga Wagga 500 kV substation;
  - between Wagga Wagga and Bannaby 500 kV substation;
- three new 500/330/33 kV 1,500 MVA transformers at the Maragle substation and two new 500/330/33 kV 1,500 MVA transformers at the Wagga Wagga substation;
- augmenting the Maragle substation to accommodate the additional transmission lines;
- augmenting the existing substations at Wagga Wagga and Bannaby to accommodate the additional transmission lines/transformers.

Option 3C is expected to provide net benefits to consumers and producers of electricity and to support energy market transition through:

- increasing the transfer capacity between the Snowy Mountains and major load centres of Sydney, Newcastle and Wollongong;
- enabling greater access to lower cost generation to meet demand in these major load centres;
- facilitating the development of renewable generation in high quality renewable resource areas in southern NSW as well as southern states, which will further lower the overall investment and dispatch costs in meeting NSW demand whilst also ensuring that emissions targets are met at the lowest overall cost to consumers; and
- increasing the competitiveness of bidding in the wholesale market.

The estimated capital cost of Option 3C is approximately $3,317 million ($2020/21) and is comprised of:

- 55 per cent transmission lines costs (5 per cent of which is land costs);
- 17 per cent substation costs (1 per cent of which is land costs); and
- 28 per cent biodiversity offset costs.

Annual operating and maintenance costs are estimated to be 0.5 per cent of capital costs (excluding capital costs relating to biodiversity costs, since these are one-off and do not require ongoing operating costs).

Construction is expected to start in 2023/24 with delivery and completion of inter-network testing expected by 2026/27. The timing has been updated since the 2020 ISP (and PADR) to reflect our current best estimate of how long we expect the project will take to commission.

Once the RIT-T process is complete, we intend to submit an initial CPA to the AER for HumeLink to seek cost recovery for works necessary to develop a robust final cost estimate for the project.

We also note that activities not related to the RIT-T but necessary to progress assessment of the project in order to achieve approval, are also being undertaken, including the Environmental Impact Statement process. This includes community and stakeholder consultation on line route specifics for the preferred option.

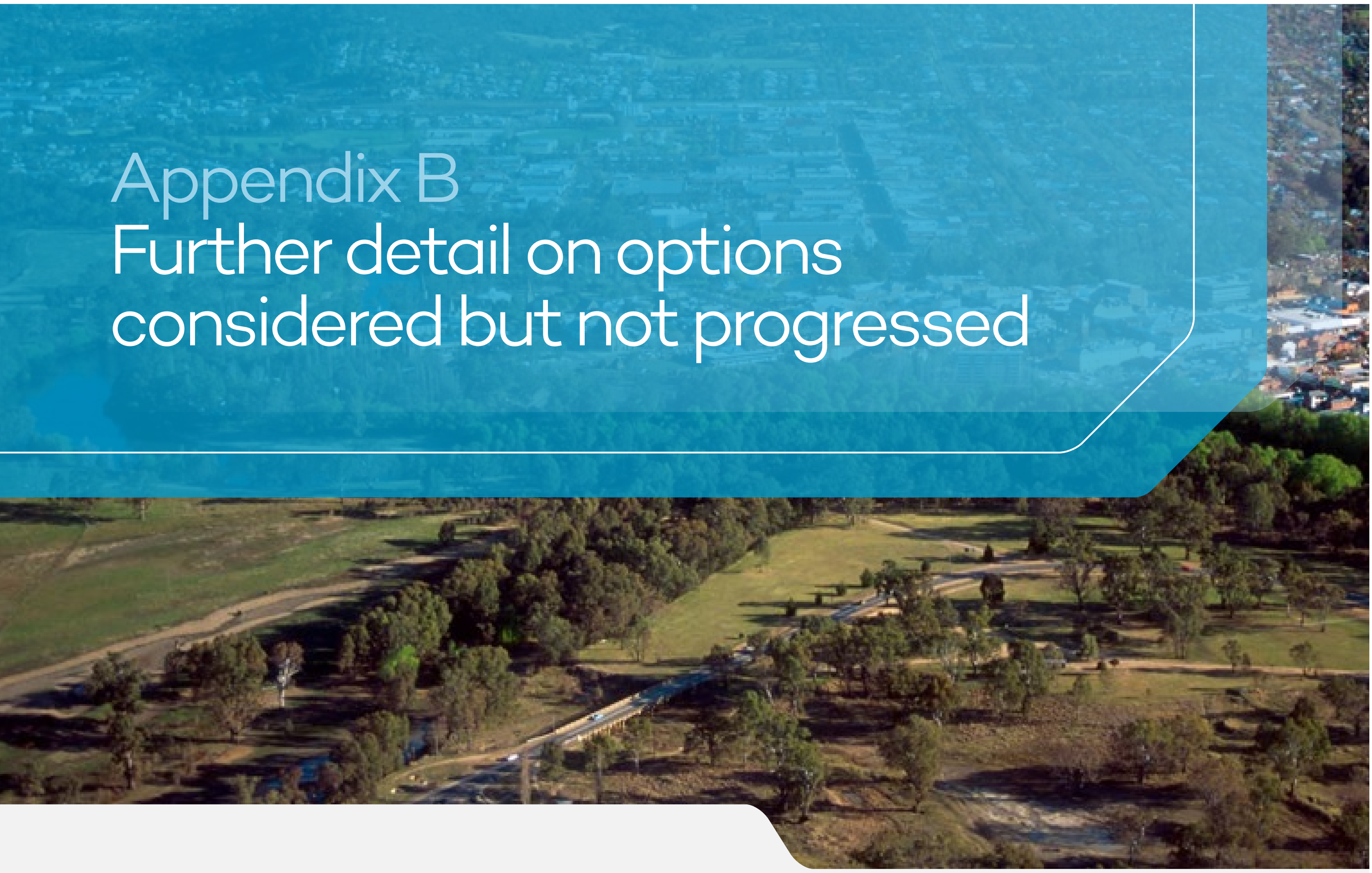
Appendix A
Checklist of compliance clauses

This section sets out a compliance checklist which demonstrates the compliance of this PACR with the requirements of clause 5.16A.4(j) of the National Electricity Rules version 167.

RULES CLAUSE	SUMMARY OF REQUIREMENTS	RELEVANT SECTION(S) IN PACR
5.16A.4(j)	The project assessment conclusions report must include:	-
	(1) the matters detailed in the project assessment draft report as required under paragraph (d)	See below.
	(2) a summary of, and the RIT-T proponent's response to, submissions received, if any, from interested parties sought under paragraph (f).	4
5.16A.4(d)	The project assessment draft report must include:	-
	(1) include the matters required by the Cost Benefit Assessment Guidelines;	While the AER Cost Benefit Assessment Guidelines do not apply to HumeLink,[114] we have covered these matters below.
	(2) adopt the identified need set out in the *Integrated System Plan* (including, in the case of proposed reliability corrective action, why the RIT-T proponent considers reliability corrective action is necessary);	3
	(3) describe each credible option assessed	5 and Appendix B
	(4) include a quantification of the costs, including a breakdown of operating and capital expenditure for each credible option	5 and Appendix B
	(5) assess market benefits with and without each credible option and provide accompanying explanatory statements regarding the results	Section 8 presents the market benefits for each option relative to the base case for each of the four scenarios (i.e., without the option in-place).
	(6) if the RIT-T proponent has varied the ISP parameters, provide demonstrable reasons in accordance with 5.15A.3(b)(7)(iv)	2.2.4
	(7) identify the proposed preferred option that the RIT-T proponent proposes to adopt	9
	(8) for the proposed preferred option identified under subparagraph (7), the RIT-T proponent must provide: (i) details of the technical characteristics; and (ii) the estimated construction timetable and commissioning date.	9
Binding elements for the PACR from the Cost Benefit Assessment Guidelines	When publishing the Conclusions Report, RIT–T proponents are required to:	-
	Publish, in addition to a summary of submissions, any submissions received in response to the Draft Report, unless marked confidential.	See https://www.transgrid.com.au/humelink
	Date the Conclusions Report to inform potential disputing parties of the timeframes for lodging a dispute notice with the AER.	See cover page.
	If a RIT-T proponent receives any confidential submissions on its Draft Report, it must consider working with submitting parties to make a redacted or non-confidential version public.	This has been undertaken for the one confidential submission received.

114. AER, *Guidelines to make the Integrated System Plan actionable*, Final Decision, August 2020, p. 19.

Appendix B
Further detail on options considered but not progressed



This appendix outlines the various options that have been considered but not progressed over the course of this RIT-T.

B.1 OPTIONS RULED OUT AT THE PACR STAGE

B.1.1 Options ruled out on the basis of the PADR analysis

The PACR does not assess Option 2A or Option 3A from the PADR (the two 330 kV build and operate options of these network topologies) since they were found to have significantly lower benefits than the other options and, in particular, Option 3C. Specifically, the PADR found these options to have net benefits that were 38 and 36 per cent lower than Option 3C, on a weighted basis.

The PACR also does not assess the three 'topology 4' options from the PADR (involving new transmission lines in an electrical 'loop' between Maragle, Wagga Wagga and Bannaby and direct between Bannaby and Sydney). These options have significantly greater costs than the other options (with the updated 'class 4' cost estimates in the order of $4.7 billion to $5 billion) and the PADR analysis showed that they are not expected to provide commensurately greater market benefits than their counterparts following the three topologies outlined above.

B.1.2 Use of single-circuit versus double-circuit

As part of this PACR, we have investigated different circuit configurations of the top performing network topologies and operating capacities in the PADR analysis (i.e., 'Option 2C' and 'Option 3C'). Specifically, we investigated:

- three variants of the preferred network topology and operating capacity in the PADR and PACR analysis, i.e., Option 3C:
  - Option 3C is constructed as 100 per cent double-circuit configuration – estimated capital cost of $3,317 million;
  - Option 3C-0 is constructed as a 100 per cent single-circuit configuration (which is the 'ISP candidate option' identified in the 2020 ISP) – estimated capital cost of $4,253 million; and
  - Option 3C-1 is constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby – estimated capital cost of $3,509 million;
- two variants of the second-ranked network topology and operating capacity in the PADR analysis, i.e., Option 2C:
  - Option 2C is constructed as 100 per cent double-circuit configuration – estimated capital cost of $3,399 million.
  - Option 2C-1 is constructed primarily as a single-circuit configuration but with a 132 km double-circuit portion west of Bannaby – estimated capital cost of $3,770 million;
  - we did not investigate a fully single-circuit version of Option 2C (i.e., an Option 2C-0) since, based on the assessment of 3C-0, the costs of this configuration are expected to be significantly greater than the other two variants (without providing any additional benefit).

Each variant for the two network topologies is electrically the same and so delivers the same expected gross market benefits. All options involving double-circuit portions of transmission line (i.e., 2C, 2C-1, 3C and 3C-1) were assessed to investigate lower cost variants of the top performing network topologies and operating capacity. Specifically, the use of double-circuitry for portions of these lines reduces the associated land and environmental offset costs compared to two separate single-circuit portions.

Appendix B Further detail on options considered but not progressed (continued)

Further assessment following the PADR of the network risks associated with double circuit topology has enabled double-circuit options to be included. The key findings from this risk/mitigation assessment were that:

- inclusion of surge arrestors on towers and improving their earthing design have been assessed as effective in mitigating risk of double-circuit outages from lightning strikes;
- the impact of tripping two circuits due to bushfires can be managed by pre-emptively reducing the HumeLink transfer capacity when there is a bushfire in the vicinity; and
- line configurations including double circuit in areas where bushfires are considered a more manageable risk have been assessed (and included as the 132km section west of Bannaby for Option 2C-1 and Option 3C-1 above).

The benefits arising from separated single circuit lines has been reviewed and assessed against the incremental environmental and community impact relative to double circuit topology. The incremental cost and impact of single circuit configurations, weighed against risks of effectively designed double circuits, has been assessed as favouring consideration of double circuit configuration on an equivalent footing with single circuit options.

Overall, the outworking of this process is that Option 2C and Option 3C from the PADR are presented in the PACR as complete double-circuit options, which allows significant cost reductions relative to where they are constructed as either a single-circuit, or a combination of single- and double-circuit, configuration. The additional work undertaken since the PADR assessing the risks involved with double-circuit configuration, compared to single-circuit, and how these risks can be mitigated, has enabled these two options to be refined as part of this PACR.

The variants of these options involving single circuit line (i.e., Option 3C-0, Option 3C-1 and Option 2C-1) have not been included as options in the body of this PACR due to their significantly greater costs compared with the double-circuit variants, but with the same market benefits (ie, they are not economically feasible).

B.1.3 Consideration of the 2020 ISP candidate option

While AER has stated that the new ISP Rules require that the ISP candidate option is considered as a credible option in the RIT-T analysis,[115] we have not presented the results for Option 3C-0 in the body of the PACR since it is always inferior to Option 3C (as outlined in the section above) and thus is considered superfluous to the outcome of the RIT-T.

Instead, we have presented the assessment of this credible option in the table below, alongside Option 3C (which is the preferred option under the RIT-T). For all four scenarios, Option 3C-0 has significantly lower net benefits than Option 3C due to its greater costs.

Table B-1 Net market benefits of Option 3C-0 compared to Option 3C, $m NPV

OPTION	CENTRAL	FAST-CHANGE	STEP-CHANGE	SLOW-CHANGE
3C	520	487	1,271	-1,177
3C-0	-55	-88	696	-1,752

B.1.4 Option 3D – New 500 kV lines between Blowering and Bannaby, and between Blowering and Wagga Wagga, and constructing new 330 kV lines between Blowering and Maragle

We investigated a new option as part of the PACR that we initially considered may be able to be a lower scope and cost version of the 'topology 3' options, i.e., those casting a wider footprint than the other options and going via Wagga Wagga, that would open up both direct and additional capacity for new renewable generation in southern NSW. Option 3D is electrically different to the Option 3C variants and involves four 500 kV transmission lines.

This option involves constructing new 500 kV lines between Blowering and Bannaby, and between Blowering and Wagga Wagga, and constructing new 330 kV lines between Blowering and Maragle. All lines are double-circuit.

The high level scope includes:

- New Wagga Wagga 500/330 kV substation and 330 kV connection to the existing Wagga Wagga substation
- New Blowering 500/330 kV substation
- Construct four 500 kV transmission lines:
  - Between Blowering and Bannaby 500/330 kV substation; and
  - Between Blowering and Wagga Wagga 500/330 kV substation;
- Construct two 330 kV transmission lines:
  - Between Blowering and Maragle 500/330 kV substation

115. AER, Explanatory statement, Draft *guidelines to make the Integrated System Plan actionable*, p. 43.

Appendix B Further detail on options considered but not progressed (continued)

- Three new 500/330/33 kV 1,500 MVA transformers at Blowering substation and two new 500/330/33 kV 1,500 MVA transformer at Wagga Wagga substation
- Augment the existing substations at Wagga Wagga and Bannaby to accommodate the additional transmission lines/transformers.

An initial assessment of running a 330 kV double circuit lines from Blowering to Maragle was undertaken as 330 kV is cheaper than 500 kV to construct. However, late in the assessment, it came to light that the 330 kV double circuit lines would be required to use high temperature conductors, which added significantly to cost. The overall capital cost of this option is expected to be in the order of $3,453 million and, since this option was not found to deliver significantly greater market benefits than the other options, we concluded that it is not a credible option (and it is not economically feasible) and have not included it in the body of this PACR.

B.2 OPTIONS RULED OUT AT THE PADR STAGE

As outlined in section 4.2.2 of the PADR, Snowy Hydro [116] and participants at the TAPR forum raised the possibility of a staged development, bringing forward of one of the circuits from Maragle to Bannaby prior to the completion of Snowy 2.0 to support load in New South Wales with improved access to existing generation at the Snowy scheme and Victorian generation.

We have not included this as a credible option in the assessment as it is not technically feasible to move forward parts of HumeLink, given that there is insufficient time to obtain the necessary environmental approvals to do so.

B.3 OPTIONS RULED OUT AT THE PSCR STAGE

We have considered a range of other potential options as part of this RIT-T but ceased to progress these as part of the PSCR on the grounds that they are not considered technically and/or economically feasible, and therefore are not credible options.

A summary of each is provided in Table B-2.

Table B-2 Options considered but not progressed at the PSCR stage

OPTION	OVERVIEW	REASON(S) IT HAS NOT BEEN PROGRESSED
Brownfield options	We have considered options that re-use existing transmission line routes ("brownfield" options). These options may be, for example: • replacement of existing single-circuit transmission lines with double-circuit transmission lines; and • replacement of existing standard conductor transmission lines with high capacity conductor transmission lines. The scope of "brownfield" options includes demolition of existing transmission lines and construction of new single-circuit high capacity or double-circuit transmission lines on multiple existing transmission line routes.	The removal of several existing transmission lines for their demolition and construction periods would remove capacity from the transmission system and significantly increase constraints on generation and inter-regional transfers within the NEM. We will consider re-use of existing corridors where practical and cost-effective, where the impact of outages on the market is within our reliability and network performance obligations.
HVDC options	We have also considered HVDC options following the topologies set out in options 1, 2, 3 and 4. [117] These would require the installation of two or three new HVDC transmission lines, tie transformers and switchgear	Preliminary estimation has found that HVDC options would be substantially more expensive than other potential greenfield options and would not provide materially higher capacities. These options have costs that are between 50 and 100 per cent higher than other options with comparable capacity. These options are therefore not considered economically feasible, as the higher costs are not expected to be outweighed by materially higher market benefits, and have not been considered further as part of this RIT-T.

This appendix represents additional detail provided in the PADR on the two key wholesale market modelling exercises EY have undertaken as part of this PACR assessment, as well as how intra-regional constraints have been modelled.

The accompanying market modelling report provides additional detail on these modelling exercises, as well as the key modelling assumptions and approach adopted more generally.

116. Snowy Hydro, p 2.

117. The topology of option 3D differs from the other options, with transmission lines from Snowy 2.0 to Wagga and Wagga to Sydney, to minimise the number of HVDC converter stations required.

Appendix C
Additional detail on the market modelling undertaken

C.1 LONG-TERM INVESTMENT PLANNING

The Long-term Investment Planning function is to develop generation (including storage) and unrelated transmission infrastructure forecasts over the assessment period for each of the credible options and base cases.

This exercise determines the least-cost development schedule for each credible option and scenario drawing on assumptions regarding demand, reservoir inflows, generator outages, wind and solar generation profiles, and maintenance over the assessment period.

The generation and transmission infrastructure development schedule resulting from the Long-term Investment Planning is determined such that:

- it economically meets hourly regional and system-wide demand while accounting for network losses;
- it builds sufficient generation capacity to meet demand when economic while considering potential generator forced outages;
- the cost of unserved energy is balanced with the cost of new generation investment to supply any potential shortfall;
- generator's technical specifications such as minimum stable loading, and maximum capacity are observed;
- notional interconnector flows do not breach technical limits and interconnector losses are accounted for;
- hydro storage levels and battery storage state of charge do not breach maximum and minimum values and cyclic losses are accounted for;
- new generation capacity is connected to locations in the network where it is most economical from a whole of system cost;
- NEM-wide emissions constraints are adhered to;
- NEM-wide and state-wide renewable energy targets are met, or else penalties are applied;
- refurbishment costs are captured;
- generator maintenance outages are scheduled to represent planned generator outages;
- regional and mainland reserve requirements are met;
- energy-limited generators such as Tasmanian hydro-electric generators and Snowy Hydro-scheme are scheduled to minimise system costs; and
- the overall system cost spanning the whole outlook period is optimised whilst adhering to constraints.

The Long-term Investment Planning adopts the same commercial discount rates as used in the NPV discounting calculation in the cost benefit analysis. This is consistent with the approach taken in the 2020 ISP.[118]

Coal-fired and gas-fired generation is treated as dispatchable between its minimum load and its maximum load in the modelling. Coal-fired 'must run' generation is dispatched whenever available at least at its minimum load, while gas-fired CCGT 'must run' plant is dispatched at or above its minimum load. Open cycle gas turbines are typically bid at their short run marginal cost with a zero minimum load level, and started and operated whenever the price is above that level. The accompanying market modelling report provides additional detail on how cycling constraints have been reflected in the analysis.

The Long-term Investment Planning model ensures there is sufficient dispatchable capacity in each region to meet peak demand in the region, plus a reserve level sufficient to allow for generation or transmission contingences which can occur at any time, regardless of the present dispatch conditions.

Due to load diversity and sharing of reserve across the NEM, the reserve to be carried is minimised at times of peak, and provided from the lowest cost providers of reserve including allowing for each region to contribute to its neighbours reserve requirements through interconnectors.

The market modelling report accompanying this PACR provides additional detail on the assumptions and methodological approaches adopted in the Long-term Investment Planning, including necessary model simplifications, sub-regional modelling and how new capacity has been modelled.

118. AEMO, *Planning and Forecasting 2019 Consultation Process Briefing Webinar*, Wednesday 3 April 2019, slide 21.

Appendix C Additional detail on the market modelling undertaken (continued)

C.2 MODELLING OF DIVERSITY IN PEAK DEMAND

The market modelling accounts for peak period diversification across regions by basing the overall shape of hourly demand on nine historical years ranging from 2010/11 to 2018/19.

Specifically, the key steps to accounting for this diversification are as follows:

- the historical underlying demand has been calculated as the sum of historical metered demand and the estimated rooftop PV generation based on historical rooftop PV capacity and solar insolation;
- the nine-year hourly pattern has been projected forward to meet future forecast annual peak demand and energy in each region;
- the nine reference years are repeated sequentially throughout the modelling horizon; and
- the future hourly rooftop PV generation has been estimated based on insolation in the corresponding reference year and the projection of future rooftop PV capacity, which is subtracted from the forecast underlying demand along with other behind-the-meter components (e.g., electric vehicles and domestic storage) to get a projection of hourly operational demand.

This method ensures the timing of peak demand across regions reflects historical patterns, while accounting for projected changes in rooftop PV generation and other behind-the-meter loads and generators that may alter the diversity of timing.

Additional detail on how peak period diversification has been modelled is provided in the market modelling report accompanying this PACR.

C.3 MODELLING OF INTRA-REGIONAL CONSTRAINTS

The wholesale market simulations include models for intra-regional constraints in addition to the inter-regional transfer limits.

Key intra-regional transmission constraints in New South Wales have been captured by splitting NSW into zones (NNS, NCEN, CAN and SWNSW), and explicitly modelling intra-regional connectors across boundaries or cut-sets between these zones. Bi-directional flow limits and dynamic loss equations were formulated for each intra-regional connector. To more accurately capture the benefit of the options being considered, the Canberra zone is split into further nodes and an equivalent network has been developed for this zone to accommodate the DC power flow with all transmission lines, both existing and defined in the options, explicitly modelled by its impedance and thermal limits.

In addition, loss factors for each generator were applied. These were computed from an AC power flow programme interfaced with the Long-term Investment Planning model. The loss factors for each generation investment plan were computed on a five-year basis up to 2030-31 and fed back into the Long-term Investment Planning model to capture both the impact on bids and intra-zonal losses.

Beyond 2030/31, the loss factors have been maintained at the same values as 2030-31, since network changes beyond that stage and additional renewable generation are becoming much less certain. However, this does not preclude generation investment if economic at any location.

Appendix D
Summary of consultation on the PADR

Formal submissions from eight parties were received in response to the PADR, seven of which have been published on our website (one submitter requested confidentiality).[119] This appendix provides a summary of non-confidential points raised by stakeholders during the PADR consultation process.

The points raised are grouped by topic and a response is provided to every point raised. All section references are to this PACR, unless otherwise stated.

A similar table was included in the PADR for submissions received on the PSCR (see Appendix B of the PADR). We note that some of the points summarised in that appendix have been superseded by analysis in the current PACR.

Table A-3 – Summary of points raised in consultation on the PADR

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
TIMING AND SCOPE OF THE OPTIONS		
The optimal timing of the preferred option and whether it can be delayed		
Request that specific validation of the optimal timing in each scenario and sensitivity is shown.	EnergyAustralia, p. 2.	See section 4.1.1.
Explain the inconsistency in timing for the preferred option between AEMO's draft 2020 ISP (which describes this project as a 'no regrets' option in 2025-26) and the PADR (which assumes a 2024-25 timing).	EnergyAustralia, p. 2.	While the 2020 ISP stated that HumeLink should be delivered in 2024/25 in the majority of places (i.e., the same timing as the PADR), it did refer to 2025-26 in three places. EnergyAustralia would need to check with AEMO the reasons for these two different dates.
Queried whether the investment decision can be delayed.	EnergyAustralia, p. 5.	
Queries whether there are regret costs in some cases, or under some sensitivities, if the project proceeds in 2024-25.	EnergyAustralia, p. 2.	We do not consider it possible to commission the project in 2024/25.

119. https://www.transgrid.com.au/what-we-do/projects/current-projects/Reinforcing%20the%20NSW%20Southern%20Shared%20Network

Appendix D Summary of consultation on the PADR (continued)

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
Whether the options should be extended to all include reinforcing the southern and western Sydney transmission network		
Suggest we should continue to investigate the possible future reinforcement of the southern and western Sydney transmission network to ensure the critical southern supply route meets future demand requirements through diversified lateral feeders into the greater Sydney metro load centre.	Snowy Hydro, p. 2.	See section 4.1.2.
Priority should be given to bring HumeLink to the Sydney West load centre, which could be undertaken through a further stage of 'Powering Sydney's Future' with parallel pathing of the approvals and route selection process.	Snowy Hydro, p. 6.	
It is unclear whether the preferred option will require completion of the proposed additional 330 kV circuit between Bannaby and Sydney West as set out in Option 4A to accommodate the required higher flows from southern NSW towards the Sydney West switchyard, following the planned retirement of generation in the Hunter Valley and Central Coast electrical sub-regions of NSW to deliver the calculated market benefits set out in the RIT-T.	ERM Power, p. 4.	
The topology 4 easement is valuable and should be used for a double-circuit 500kV line to ensure the very long-term needs of supply to Sydney from the south is secured.	Email submission from Malcolm Park.	
Does the Bannaby to Sydney West (Line 39) transmission line constrain optimal dispatch over the outlook period, once the preferred option has been installed.	EnergyAustralia, p. 5.	
While Option 4C is the most likely to reduce network congestion, it is understandable that the additional expense over Option 3C may not be justified by these benefits. In any case deeper connection to the load can be done at a later date if deemed valuable.	Neoen, p. 1.	
Whether the options can be staged to provide greater net benefits		
Consideration should be given to staging the preferred option from a consumer benefit perspective. ERM Power suggests that, while an initial segment between Wagga Wagga and Bannaby is warranted, the other elements of the project could be staged.	ERM Power, pp. 2 & 3.	See section 4.1.3.
Why Option 3C does not require a phase shifting transformer		
It is unclear why Option 3B requires installation of a phase shifting transformer on Bannaby to Sydney West 330 kV line to control flows across this network flow path, yet the preferred option which will result in the delivery of higher flows to the 500 and 330 kV Buses at Bannaby does not have this same requirement.	ERM Power, p. 3.	See section 4.1.4.
Whether the preferred option can be coupled with modular power flow control equipment to provide greater net benefits		
Propose the use of modular power flow control (MPFC) equipment as part of the project in order to extract the maximum capability from the existing transmission system. MPFC should be assessed based on an evaluation of the net economic benefits it would provide in the context of the preferred solution.	Smart Wires, pp. 2-3.	See section 4.1.5.

Appendix D Summary of consultation on the PADR (continued)

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
ASSUMPTIONS USED IN MARKET MODELLING		
Please clarify if the central real, pre-tax discount rate of 5.9 per cent, as well as the sensitivities at 2.85 per cent and 8.95 per cent, have been applied to the discounted cash flow analysis and generator hurdles rates as well as when determining the annualised costs of the transmission investment and therefore in determining the optimal timing.	EnergyAustralia, p. 2.	See section 4.2.
Seek clarification on how the departures from the 2020 ISP assumptions (including advanced closing of half of the coal power station capacity in the NEM by 2 to 5 years in three of the four scenarios) affects the net benefits and timing of the preferred option.	EnergyAustralia, p. 3.	
Confirm whether the cost of Snowy 2.0 is treated as a sunk cost.	EnergyAustralia, p. 4.	Snowy 2.0 received environmental approval and construction approval from the Federal government in mid-2020. We consider Snowy 2.0 as a 'committed project' under the RIT-T and so the costs are treated as sunk in the analysis. This is consistent with the final 2020 ISP, which refers to Snowy 2.0 as committed and includes it in all scenarios.[120]
Confirm that, if a hypothetical market driven announcement to install a 500 MW OCGT/CCGT in NSW (upstream of Bannaby) occurred in the next few months, this would be treated as a sunk cost, and whether this would have any bearing on the cost benefits analysis and the preferred timing.	EnergyAustralia, p. 4.	An announcement of a market-driven entry of a new 500 MW OCGT/CCGT in NSW (upstream of Bannaby) would enter the RIT-T assessment as part of the counterfactual base case. The costs of this generator would not form part of the costs of the base case. However, to the extent that the generator was not fully committed and was expected not to proceed if the HumeLink development went ahead, the avoided cost would enter the assessment of the HumeLink options. We have investigated a sensitivity assuming that the recently announced Kurri Kurri and Tallawarra B gas plants are in-place (see section). This finds that the preferred option would continue to deliver substantial positive net market benefits to the market.
Concern that the modelling of hydro assumes perfect foresight and is targeted to reduce total system costs. EnergyAustralia suggests this is unreasonable and that basing the development path and investment decisions on operational assumptions that are inconsistent with reality is a concern. Request considerations of whether the benefits outlined in the PADR are overstated because hydro modelling assumes perfect foresight and is targeted to reduce total system costs.	EnergyAustralia, p. 4.	See section 4.2.
EnergyAustralia questions whether Snowy Hydro's portfolio after the construction of Snowy 2.0 could influence dispatch outcomes away from the perfect outcomes represented in SRMC bidding.		
Confirm whether historical peak demand coincident factors are maintained in the demand traces.	EnergyAustralia, p. 4.	See section 4.2.
Explain how EY has calibrated its market modelling to actual outcomes, and how it extrapolates this over the outlook period.	EnergyAustralia, p. 4.	See section 4.2.
Outline the use of EY generation forced outage rates and mean time to Repair assumptions and explain how they differ from those used by AEMO in its ISP.	EnergyAustralia, p. 4.	See section 4.2.

120. AEMO, *Integrated System Plan*, July 2020, pp. 33 & 51.

Appendix D Summary of consultation on the PADR (continued)

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
Explain and publish the dynamic loss equations and changes, including discussion on whether there are any material benefits in terms of loss savings.	EnergyAustralia, p. 5.	See section 4.2.
Outline whether transient and voltage stability limits are included in modelling, and whether they impact on the transfer capacity modelled in the system technical assessment studies.	EnergyAustralia, p. 5.	Both transient and voltage stability limits are included in the modelling. They have been assessed in accordance with industry standards and are taken into account in the transfer capacities of the options.
Queries whether there is confidence that the modelling of additional pumping capacity adequately represents the characteristics necessary to fully understand the power system transient stability performance when pumps operate.	Email submission from Malcolm Park.	
The market benefit is dependent on a large number of modelling input assumptions occurring in what is an uncertain future.	ERM Power, p. 2.	The RIT-T assessment continues to consider four reasonable scenarios, which differ in relation to demand outlook, DER uptake, assumed generator fuel prices, assumed emissions targets, retirement of coalfired power stations, and generator and storage capital costs. The scenarios reflect a broad range of potential outcomes across the key uncertainties that are expected to affect the future market benefits of the investment options being considered and are aligned with the scenarios used by AEMO in the final 2020 ISP. A range of sensitivity tests have also been investigated in order to further test the robustness of the outcome to key uncertainties.
The modelling should calculate the net market benefit using the total calculated estimated cost for EnergyConnect and VNI West as well as HumeLink.	ERM Power, p. 2.	See section 4.2.
The market benefit modelling should be conducted on the HumeLink project in isolation with both the EnergyConnect and VNI West projects excluded.	ERM Power, p. 2.	
Consider that low demand sensitivities should be run on all modelled scenarios (reflecting in particular the outlook for future smelter load) to assess the impact of events like smelters shutting down.	ERM Power, p. 3.	See section 4.2.
MODELLING OUTCOMES		
Explain the apparent significant avoided generation or storage capital costs (excl. fuel costs) in the years before the transmission is commissioned.	EnergyAustralia, p. 2.	This reflects plants changing their behaviour in anticipation of HumeLink being commissioned.
Requests additional information and analysis on the assumed changes in the supply side, notably in Pumped Hydro Energy Storage, and coal-fired installed capacity in order to understand the level of reliance the conclusions have on these assumptions and whether the system will be operationally manageable.	EnergyAustralia, pp. 2-3.	See section 4.3.

Appendix D Summary of consultation on the PADR (continued)

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
EnergyAustralia is concerned that the central case finds that an additional 11,300 GW of long duration pumped hydro storage, in addition to the capacity provided by Snowy 2.0, is required by 2044/45. Further, the lack of utility scale batteries appears to be disconnected from what is happening in the market today and gas-fired generation appears to be missing from the supply mix. We consider TransGrid should produce a sensitivity that challenges the presumption of pumped hydro playing a critical role in the transition of the electricity system.	EnergyAustralia, p. 3.	See section 4.3.
Encourage details of the sensitivity studies around closure of coal plant based on economic viability to be summarised and published, including the details on the closure criteria applied.	EnergyAustralia, p. 3.	See section 4.3.
Request that we publish EYs findings of the sensitivities around Snowy 2.0 not proceeding, halving the planned storage, having reduced capacity, and reduced round trip efficiency, on the timing of the preferred option.	EnergyAustralia, p. 3.	See section 4.3.
Provide more detail on how much dispatchable capacity is available in NSW and more broadly across the NEM in the scenario outlooks.	EnergyAustralia, p. 3.	Dispatchable capacity exceeds demand at all times by the reserve level, unless load shedding or demand side participation is occurring. The workbooks released alongside the PADR include this dispatchable capacity – see in particular the market modelling output workbooks, capacity worksheets, published on the HumeLink RIT-T website.
EnergyAustralia raised three questions for the forecast scenarios: How dependent is power system operation, or maintaining the reliability standard, on the implausible levels of pumped hydro from the long-term planning? If the forecast capacity of pumped hydro does not arrive, does the system face significant security and reliability challenges? Will system strength, low inertia or frequency/voltage control issues prevail that have not been considered in the study? Will the remaining dispatchable coal plants be able to ramp up and down to efficiently support the swings in intermittent generation from new capacity built as a result of the new interconnector?	EnergyAustralia, pp. 3-4.	See section 4.3.
Request that the utilisation of HumeLink (% of transfer capacity) is published, including intraday flows and duration curves.	EnergyAustralia, p. 6.	See section 4.3.
COSTS OF THE OPTIONS		
Confirm if the network project costs include easements and land acquisition allowances. Confirm what needs to be done to refine 'midpoint' costs for the purposes of the PACR.	EnergyAustralia, p. 5.	See section 4.4.
Recommend that in finalising this RIT-T process that costings be subject to potential variation not greater than +/- 15 per cent.	ERM Power, p. 3.	
Confirm the transmission asset economic lives used, and the 1 per cent O&M capex per annum assumption are consistent with AER views when approving expenditure allowances.	EnergyAustralia, p. 5.	See section 4.4.
Request that the cumulative transmission capex/opex on annual profile charts be published (Figures 5, 10, 15 and 20 in the PADR).	EnergyAustralia, p. 5.	See section 4.4.

Appendix D Summary of consultation on the PADR (continued)

SUMMARY OF COMMENT(S)	SUBMITTER(S)	OUR RESPONSE
THE INCIDENCE OF MARKET BENEFITS		
Request that the modelled price outcomes are published, including duration curves and intraday price shape.	EnergyAustralia, p. 5.	See section 4.5.
Request that the regional benefits, relative to regional costs, are published (particularly for NSW, SA and VIC).	EnergyAustralia, p. 5.	See section 4.5.
Recommends that TransGrid determine the share of benefits from the investment that accrue to Snowy 2.0 and those that accrue to consumers. TransGrid should identify any imbalance of costs and benefits for NSW consumers and examine options to address this, including Snowy 2.0 being required to directly fund a commensurate portion of the investment, as part of the HumeLink RIT-T.	PIAC, p. 3.	
Recommend that the proponents also consult on and conduct modelling with regards to the changes in consumers and supplier benefits as part of this RIT-T process.	ERM Power, p. 2.	
DIVERSITY BENEFITS FROM AN ELECTRICAL 'LOOP' AND THE USE OF DOUBLE-CIRCUIT VERSUS SINGLE-CIRCUIT		
Suggests that the need for two new single-circuit lines in sections where one double-circuit line could be enough is reviewed.	Email submission from Malcolm Park.	See section 4.7.
Summarise the preconditions and insights into the methodology used to determine the cost estimate if two lines of an interconnector were to fail simultaneously ($450 million). EnergyAustralia, requests to see views on the probability of this event, the forced outage rate and the mean time to repair.	EnergyAustralia, p. 5.	See section 4.6.
OTHER POINTS RAISED		
Submit that the Maragle 330 kV substation and the cut in line to Line 64 should be captured in the RIT-T process. Maragle 330kV substation would allow access to existing Snowy and Victorian generation which is currently constrained out of the NSW market. This would be in addition to the connection of Snowy 2.0 which would also connect into the existing Maragle substation by extending the 330 kV bus and installing dedicated 330 kV connection bays for the Snowy 2.0 connecting lines.	Snowy Hydro, p. 6.	The shared network component covered by the RIT-T relates to all transmission assets up to but not including the connection point for a generator. The extent of works for the shared network are set out in the option descriptions in this PACR.
We believe that a review of this RIT-T process by the AER, similar to the review undertaken by the AER of the proposed EnergyConnect project RIT-T process, would provide additional certainty to consumers that the proposed project will deliver a net market benefit.	ERM Power, p. 4.	We will be seeking AER approval of a contingent project allowance for this investment, which is expected to proceed in two stages. As part of the staged contingent project process, we will seek a 'feedback loop' confirmation from AEMO if the future estimated costs of the preferred option exceed those currently estimated in the RIT-T assessment. The feedback loop is designed to confirm whether the project remains part of AEMO's optimal development path.


TransGrid