



Australian Energy Market Commission

CONSULTATION PAPER

ESTABLISHING REVENUE DETERMINATIONS FOR INTENDING TNSPS

PROPONENT

Marinus Link Pty Ltd

05 MAY 2022

RULE

INQUIRIES

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ABOUT THE AEMC

The AEMC reports to the Energy Ministers' Meeting (formerly the Council of Australian Governments Energy Council). We have two functions. We make and amend the national electricity, gas and energy retail rules and conduct independent reviews for the Energy Ministers' Meeting.

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1 INTRODUCTION

On 3 March 2022, Marinus Link Pty Ltd (MLPL) submitted a rule change request to the Australian Energy Market Commission (AEMC or Commission) seeking to enable the Australian Energy Regulator (AER) to establish a revenue determination for an Intending Transmission Network Service Provider (TNSP).

By 'Intending TNSP', MLPL is referring to a party that intends to provide prescribed transmission services, but does not currently do so, and who is registered by AEMO as an Intending Participant under Chapter 2 of the NER.¹

MLPL considers a revenue determination is a key input to making an investment decision to proceed with Project Marinus. However, MLPL says the AER cannot commence a revenue determination process until the project is completed and MLPL is providing prescribed transmission services.² The rule change request seeks to address this issue for all Intending TNSPs.

The rule change request does not deal with issues, such as cost allocation, specifically related to Project Marinus or other regulated transmission assets in Commonwealth waters. MLPL states transmission cost allocation is currently under consideration by several stakeholders and, if a pricing rule change is ultimately required, it would be the subject of a separate and independent rule change proposal.³ This would include consideration of any issues associated with the location of Marinus Link in Commonwealth waters.

This consultation paper has been prepared to facilitate public consultation on the rule change request and to seek stakeholder submissions.

The paper:

- sets out a summary of, and background to, the rule change request,
- identifies several questions and issues to facilitate the consultation on this rule change request, and
- outlines the process for making submissions.

1 MLPL rule change request, cover letter, p. 1.

2 Ibid.

3 Ibid, p. 2.

2 BACKGROUND

2.1 AEMO's 'whole of system' plan identifies the need for new transmission assets

The purpose of the Australian Energy Market Operator's (AEMO's) Integrated System Plan (ISP) is to:⁴

"establish a whole of system plan for the efficient development of the power system that achieves power system needs for a planning horizon of at least 20 years for the long term interests of the consumers of electricity."

The ISP is a whole-of-system plan to efficiently achieve power system needs through transformational change, in the long-term interests of electricity consumers. AEMO has extended the ISP's planning horizon through to 2050, to reflect Australia's 2050 net zero emissions target.⁵

AEMO's draft 2022 ISP identifies the need for 10 000 km of new transmission to connect new generation and storage and deliver renewable energy to consumers throughout the NEM. It identifies a range of transmission projects that are actionable now as well as in the future.⁶ Some of these actionable ISP projects are for entirely new transmission systems – not just extensions to existing networks.

2.1.1 Marinus Link is a key actionable project under the ISP

Marinus Link is a proposed 1500 megawatt (MW) capacity undersea and underground electricity connection to further link Tasmania and Victoria. The increased transmission capacity may be delivered in two 750 MW developments. Marinus Link will be supported by transmission network developments on the North West Tasmanian electricity network.⁷

AEMO's draft 2022 ISP lists Marinus Link (cables 1 and 2) as an actionable network investment that supports the 'optimal development path'⁸ – among other major transmission projects.

AEMO stated:⁹

"Marinus Link contributes roughly \$4.6 billion of the \$26 billion in net market benefits delivered by the Draft optimal development path in the most likely scenario, and is also part of all other high-ranking candidate development paths. Marinus Link provides improved access to Tasmania's dispatchable capacity (including deep storages) and high quality [variable renewable energy] opportunities, helping reduce the scale of investment needed on the mainland. Wind farms located in Tasmania (particularly

4 Clause 5.22.2 of the NER.

5 AEMO, Draft 2022 Integrated System Plan, December 2021, p.18.

6 Ibid, p. 11.

7 See [here](#).

8 AEMO, Draft 2022 Integrated System Plan, December 2021, p. 56.

9 Ibid, p. 67.

Tasmania’s Central Highlands and North-West REZs) produce more energy than almost all REZs on the mainland, and also provide greater resource diversity to mainland wind farms. Without improved access to these resources, more mainland capacity would be required for the equivalent volume of energy, which would increase system costs all else being equal.”

Transmission businesses must apply a regulatory investment test (RIT-T) to all contingent projects, including ‘actionable’ ISP projects.¹⁰ The RIT-T for actionable ISP projects explores different options for meeting those needs to ensure a thorough cost–benefit analysis, and then chooses a preferred option to take forward.¹¹

According to the Project Assessment Conclusion Report, Project Marinus has satisfied the RIT-T requirements. TasNetworks analysis shows that Project Marinus would deliver a net economic benefit for all feasible options, and across every scenario, and should proceed.¹²

MLPL says Project Marinus is currently progressing through its design and approvals stage, which will culminate in a final investment decision in relation to the project comprising the Marinus Link interconnector, being progressed by MLPL, and the North West Transmission Developments, being progressed by TasNetworks.¹³ The majority of the capital expenditure relating to Project Marinus will be undertaken by MLPL¹⁴ – with project costs likely to be in the order of \$3 billion.¹⁵

2.1.2 Cost allocation issues are a priority for the Energy National Cabinet Reform Committee

On 10 December 2021, National Cabinet agreed new priorities for the Energy National Cabinet Reform Committee to deliver by the end of 2022.

The 2022 tasking requires Energy Ministers to report to National Cabinet on progress on improvement of the electricity transmission regulatory framework, with a focus on:¹⁶

- resolving the current regulatory issues facing major transmission projects identified in AEMO’s Integrated System Plan
- developing a national approach to guide social licence and engagement for transmission infrastructure
- reviewing the current cost allocation approach and suitability of those arrangements for inter-regional transmission (among other things).

These issues are outside the scope of this rule change request.

10 Clause 5.15A.1(b) of the NER. RIT-T projects are defined in clause 5.10.2 of the NER as a project to address an identified need identified by a TNSP, a joint planning project or an actionable ISP project.

11 Clauses 5.15A.3 and rule 5.16A of the NER.

12 TasNetworks, RIT-T Project Assessment Conclusions Report, p. 21, see [here](#).

13 More specifically, TasNetworks will be responsible for the North West Transmission Developments, while MLPL will be responsible for the DC interconnector and converter stations that make up the majority of Project Marinus costs.

14 MLPL rule change request, cover letter, p. 1.

15 Ibid, p.2.

16 See [here](#).

2.2 The economic regulation framework does not currently provide for Intending TNSPs

Once a TNSP completes the RIT-T process for an actionable ISP project, it can submit a contingent project application to the AER subject to meeting the 'trigger event criteria' set out in clause 5.16A.5 of the NER. Contingent projects are significant network augmentation projects that may arise during a regulatory control period, but where the need and or timing of the project is uncertain. As such, the AER assesses forecast expenditure for these projects outside the regular revenue determination process. Contingent projects are linked to unique investment drivers, which are defined by a 'trigger event'.

The AER will assess a contingent project application and if it is satisfied that the trigger event has occurred, it will determine an additional revenue allowance for that TNSP. This results in an adjustment to the TNSP's revenue determination to reflect the efficient and prudent forecast expenditure associated with the contingent project for each remaining year of the regulatory control period.¹⁷

However, the contingent project mechanism does not apply to Intending TNSPs who do not have a revenue determination.

The AER is responsible for the economic regulation of TNSPs in all Australian jurisdictions except Western Australia. Registered TNSPs – that is, those providing *prescribed transmission services* – must periodically apply to the AER to assess their revenue requirements (typically, every five years). The AER must then set the maximum revenue that TNSPs can recover from users of their networks.

The AER regulates TNSPs under Chapter 6A of the National Electricity Rules (NER). Clause 6A.2.1 of the NER requires the AER to make transmission determinations for TNSPs in respect of prescribed transmission services. Further, Chapter 6A also sets out the provisions governing the process by which a TNSP may obtain a revenue determination.¹⁸ However, these provisions only apply to participants who are registered as a TNSP and not a participant who is an Intending TNSP.¹⁹ Therefore, under the existing rules, MLPL considers that the AER does not have the power to make a revenue determination for an Intending TNSP.²⁰

Schedule 6A.2 of the NER sets out the arrangements for establishing a regulatory asset base (RAB) for a transmission system that has not been the subject of a revenue determination. However, this Schedule assumes the TNSP has already undertaken the investment as the value of the RAB for that transmission system is the prudent and efficient value of the assets that are used by the TNSP to provide prescribed transmission services.²¹

¹⁷ See clause 6A.8.2 and AER, Guidance Note: Regulation of actionable ISP projects, March 2021, p. 4.

¹⁸ See Chapter 6A, Part E of the NER

¹⁹ This is because Chapter 6A provides for rights and obligations in respect of a 'Transmission Network Service Provider', which is defined in Chapter 10 of the NER as a person who engages in the activity of owning, controlling or operating a transmission system. It does not apply to 'Intending Participants'.

²⁰ MLPL rule change request, p. 1.

²¹ Clause S6A.2.1(d)(2) of the NER.

2.2.1 **There is an existing mechanism to register as an Intending Participant**

Any person intending to act in any Registered Participant category, including as a Network Service Provider (NSP), may apply to AEMO for registration as an Intending Participant if it can satisfy AEMO that it intends to carry out an activity in respect of which it must be registered as a Registered Participant.²² An Intending Participant is a Registered Participant for the purposes of the NER and as such, may exercise such rights and is bound by such obligations under the NER as specified by AEMO.²³

These rights and obligations are contained in AEMO's Schedule of Rights and Obligations of Intending Participants (Schedule). Under the Schedule, and in relation to Chapter 6A of the NER, an Intending TNSP may exercise the rights and is subject to the obligations applicable to a NSP in respect of services proposed to be provided by means of the Intending TNSP's transmission system (or, in the case of an Intending DNSPs, the distribution system).

While these rights and obligations were recently proposed by AEMO and then approved by the Commission in February 2022, MLPL's view is that the Schedule is not capable of imposing obligations on the AER to conduct a revenue determination under Chapter 6A and therefore cannot address the timing issues associated with MLPL needing a determination prior to a final investment decision.²⁴

22 Rule 2.7(a) of the NER.

23 Rule 2.7(d) of the NER.

24 MLPL rule change request, cover letter, p. 3.

3 DETAILS OF THE RULE CHANGE REQUEST

MLPL's rule change request seeks to enable the AER to make a revenue determination for Intending TNSPs, including Marinus Link. Copies of the rule change request may be found on the AEMC website [here](#).

MLPL's view is that a revenue determination is a pre-requisite for obtaining finance from the capital markets (and ultimately proceeding with the project), and a revenue determination for an Intending TNSP cannot be made under the existing rules.

As outlined in section 3.1, MLPL argues the proposed rule change will contribute to the National Electricity Objective (NEO) by enabling MLPL and future Intending TNSPs to obtain a revenue determination prior to making a final investment decision.²⁵

"A rule change that facilitates a final investment decision is consistent with promoting efficient investment in electricity services for the long term interests of consumers. Specifically, as Project Marinus has satisfied the RIT-T and has been identified as an actionable ISP project by AEMO's draft 2022 ISP, it is expected to deliver substantial net market benefits."

MLPL says it is not seeking either 'special treatment' in the application of the revenue setting arrangements or early recovery of revenue.²⁶ MLPL's view is that the existing Chapter 6A provisions should apply in their standard form to Marinus Link – and, therefore, the revenue setting process and timetable would be unchanged from the current arrangements in the rules (section 3.2).²⁷

MLPL is seeking a rule determination by mid-2022, which would allow it to apply to the AER for a revenue determination in November 2022, so that it can obtain a revenue determination and make a final investment decision by December 2024.

3.1 MLPL considers the benefits of the rule change request outweigh the costs

MLPL states the proposed rule change will not have any impact on the NEM or market participants, as it is entirely procedural in nature. Apart from those Intending Participants seeking a transmission determination, MLPL says the only other parties affected by the rule change will be the AER, consumers and stakeholders in their respective roles in making revenue determinations for Intending TNSPs.²⁸

MLPL considers its rule change request:²⁹

25 MLPL rule change request, p. 4.

26 Ibid, p. 20.

27 MLPL rule change request, cover letter, p. 2.

28 MLPL rule change request, p. 6.

29 Ibid, p. 5.

- facilitates timely and efficient investment decision-making by Intending TNSPs by allowing the AER to make a revenue determination in advance of constructing transmission assets.
- establishes an appropriate revenue setting process for an Intending TNSP to allow it to deliver benefits to consumers.
- applies the existing Chapter 6A revenue determination process to Intending TNSPs, which is a well-accepted process that is understood by stakeholders and consumers.

MLPL notes the AER will be required to consider an application made by an Intending TNSP and to assess whether the proposed timetable for the revenue determination process is reasonable in the circumstances. MLPL says the cost of this assessment to the AER is likely to be modest.³⁰

Further, MLPL highlights the AER will be required to undertake revenue determinations, including stakeholder consultation, in circumstances where there is no guarantee that the Intending TNSP will provide prescribed transmission services. MLPL considers there is a low to moderate risk that the revenue determination and the associated stakeholder consultation will prove to be unnecessary.³¹

Overall, MLPL says it does not expect the costs to be material compared to the important benefit of providing a timely revenue determination that facilitates efficient transmission network investment.³²

3.2 MLPL proposes rule amendments to enable a revenue determination for an Intending TNSP

MLPL states that relatively modest drafting changes are needed to allow Chapter 6A to apply to Intending TNSPs:³³

“The proposed rule change amends Chapter 6A to enable the AER to make a revenue determination for an Intending TNSP, who is registered by AEMO as an Intending Participant under Chapter 2 of the Rules. It must be emphasised that the standard Chapter 6A process would then apply to the Intending TNSP, without amendment. Similarly, the Intending TNSP would be subject to the AER’s guidelines and schemes. The proposed Rule change achieves this outcome by requiring references to ‘TNSP’ or ‘NSP’ to be read as referring to ‘Intending TNSP’.”

MLPL considers a key aspect of the rule change is to enable an Intending TNSP to activate the Chapter 6A process by submitting an application to the AER, which would explain why the revenue determination is being requested and setting out the proposed timetable for the review. The proposed rule requires that the timetable must be consistent with the existing

³⁰ Ibid.

³¹ Ibid, p. 6.

³² Ibid.

³³ Ibid.

Chapter 6A process, so that stakeholders are afforded the same engagement and consultation opportunities.³⁴

To elaborate, to activate the Chapter 6A revenue setting process, MLPL's proposed rule requires the Intending TNSP to submit an application to the AER specifying the proposed timetable for its revenue determination – including the proposed regulatory control period:³⁵

The Intending TNSP's proposed timetable must comply with the standard revenue determination process in Part E of Chapter 6A. The Intending TNSP is also required to explain why it expects to provide prescribed transmission services during the proposed regulatory control period.

MLPL submits the proposed rule only requires the AER to make a revenue determination if it is satisfied that the proposed timetable is reasonable in the circumstances and accords with the standard revenue setting process in Chapter 6A. MLPL says if the AER is not satisfied that the timetable is reasonable, it may propose an alternative timetable or reject the application, setting out its reasons. MLPL states the purpose of these provisions is to ensure that the AER is not required to undertake revenue determinations unnecessarily.³⁶ Moreover, MLPL proposes criteria that the AER would apply to assess whether the entity seeking a revenue determination is reasonably likely to provide prescribed transmission services during the regulatory control period nominated by that entity – the purpose of which is to minimise the risk that the AER will be required to conduct revenue determinations unnecessarily.³⁷

MLPL proposes additional clarifying amendments to clause S6A.2.1(d)(2) that confirm expenditure incurred prior to the commencement of the first regulatory period should be included in the RAB, providing that it is prudent and efficient.³⁸ MLPL considers that this is required because clause S6A.2.1(d)(2) refers to the value of assets used by a TNSP (but only to the extent that they are used to provide such services) and that if expenditure already incurred could be excluded from the opening RAB, this would not be consistent with good regulatory practice or the revenue and pricing principles.³⁹

MLPL notes AEMO's Schedule of Rights and Obligations of Intending Participants framework does not impose an obligation on the AER to conduct a revenue determination process and, therefore, would not resolve the issue MLPL is seeking to address. MLPL explains amendments approved by the Commission in February 2022, as discussed above, mean that the rights and obligations that apply to a registered TNSP under Chapter 6A also apply to Intending Participants. MLPL states its proposed rule change gives effect to AEMO's rationale for amendment to the existing Schedule of Rights and Obligations of Intending Participants.⁴⁰

34 MLPL rule change request, cover letter, p. 2.

35 MLPL rule change request, p. 2.

36 Ibid.

37 MLPL rule change request, cover letter, p. 2.

38 MLPL rule change request, p. 3.

39 Ibid.

40 MLPL rule change request, cover letter, p. 4.

More detail on the proposed rule amendments can be found in attachment 1 of MLPL's rule change request.⁴¹

⁴¹ MLPL rule change request, pp. 7-19, see here:

4 ASSESSMENT FRAMEWORK

4.1 Achieving the NEO/NGO/NERO

Under the NEL the Commission may only make a rule if it is satisfied that the rule will, or is likely to, contribute to the achievement of the national electricity objective (NEO).⁴² This is the decision making framework that the Commission must apply.

The NEO is:⁴³

To promote efficient investment in, and efficient operation and use of, electricity services for the longer term interests of consumers of electricity with respect to -

- (a) price, quality, safety, reliability and security of supply of electricity; and
- (b) the reliability, safety and security of the national electricity system.

4.2 Revenue and pricing principles

In addition to the NEO, the Commission must take into account the revenue and pricing principles in making a rule for or with respect to transmission system revenue and pricing and the principles to be applied, and procedures to be followed, by the AER in exercising or performing an AER economic regulatory function or power relating to the making of a transmission determination.⁴⁴

The revenue and pricing principles are set out in section 7A of the NEL. The Commission considers the following revenue and pricing principles are the most relevant to this rule change request:

- A regulated network service provider should be provided with effective incentives in order to promote economic efficiency with respect to direct control network services the operator provides. The economic efficiency that should be promoted includes:
 - efficient investment in a distribution system or transmission system with which the operator provides direct control network services
 - the efficient provision of electricity network services
 - the efficient use of the distribution system or transmission system with which the operator provides direct control network services⁴⁵
- Regard should be had to the economic costs and risks of the potential for under and over investment by a regulated network service provider in, as the case requires, a distribution system or transmission system with which the operator provides direct control network services.⁴⁶

⁴² Section 88 of the NEL.

⁴³ Section 7 of the NEL.

⁴⁴ Section 88B of the NEL refers to items 15 to 24 and 26I to 26J of Schedule 1 to the NEL, which cover transmission system revenue and pricing and regulatory economic methodologies.

⁴⁵ Section 7A(3) of the NEL.

⁴⁶ Section 7A(6) of the NEL.

4.3 Making a more preferable rule

Under s.91A of the NEL, the Commission may make a rule that is different (including materially different) to a proposed rule (a more preferable rule) if it is satisfied that, having regard to the issue or issues raised in the rule change request, the more preferable rule will or is likely to better contribute to the achievement of the NEO.

4.4 Proposed assessment framework

The relevant aspects of the NEO in this instance are the promotion of efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers with respect to price, reliability of the national electricity system, and reliability and quality of supply of electricity supply experienced by consumers.

The Commission is proposing to use the following assessment criteria to assess whether the proposed rules are likely to promote the NEO:

- **Concepts of efficiency** – The regulatory framework should facilitate the efficient provision of electricity services, and promote efficient investment in transmission services. A key consideration in the Commission’s assessment of the rule change request is whether the proposal is likely to contribute to the lowest possible total system cost, taking into account the revenue and pricing principles.⁴⁷ This includes the economic costs and risks of the potential for under-investment in the transmission system.
- **Risk allocation** – Risks should be borne by, or allocated to, parties who are in the best position to manage them and have the incentives to do so. This ultimately leads to lower costs for consumers. The Commission will consider, for example, whether a revenue determination is a pre-requisite for Intending TNSPs to obtain finance from the capital markets.
- **Timing and uncertainty** – The Commission will consider the potential costs of uncertainty for Intending TNSPs to recover their investment costs.
- **Cost and complexity** – The Commission intends to consider whether the implementation and administrative costs arising from the rule change request are proportionate to the benefits.

⁴⁷ These principles are set out in NEL section 7A.

5 ISSUES FOR CONSULTATION

Taking into consideration the assessment framework, several issues have been identified for initial consultation. Stakeholders are encouraged to comment on these issues as well as any other aspect of the rule change request or this paper, including the proposed assessment framework.

Key questions for this rule change request are:

- What's the problem MLPL is trying to solve? Is the problem definition clear? Is this a problem that needs to be addressed to promote the long term interest of consumers (section 5.1)?
- Is the proposed rule change the most effective solution to address the problem identified by MLPL, and are there any potential risks or unintended consequences (section 5.2)?
- What are alternative solutions to the problem?

5.1 What's the problem MLPL is trying to solve?

MLPL says certainty in relation to the future revenue stream is a key pre-requisite to making a final investment decision to proceed with the Project Marinus through to construction. MLPL claims it, as well as other potential Intending TNSPs, cannot obtain project financing through capital markets if there is no certainty regarding its future revenue stream:⁴⁸

For example, providers of equity and debt financing will want to assess the risk that the actual costs of completing the project will be higher than the AER's subsequent assessment of the project's regulatory asset base. As MLPL's project costs are likely to be in the order of \$3 billion (\$2021), the magnitude of the potential shortfall in the regulatory asset base could be highly material. If the AER's view on the regulatory asset base is unknown, commercial investors will not be willing to fund the project because the risk of financial loss would be too great.

MLPL notes this is not an issue faced by existing TNSPs who can access the contingent project mechanism under an existing regulatory determination (explained above).⁴⁹

QUESTION 1: PROBLEM STATEMENT

1. Is the problem definition clear?
 - a. For example, to what extent does project financing through capital markets rely on greater certainty of cost recovery through the AER's revenue determination process?
2. Is there a risk that a failure to address this problem would have a significant negative economic impact and be inconsistent with long term interests of consumers (ie, the NEO)?

⁴⁸ MLPL rule change request, cover letter, p. 2.

⁴⁹ MLPL rule change request, p. 1.

3. Should a rule be limited to intending TNSPs that are delivering actionable ISP projects, or should it have broader application?

5.2 Does MLPL's proposed solution address the problem?

To address the above problem, MLPL seeks to enable the AER to make a revenue determination for Intending TNSPs, including Marinus Link. MLPL's proposed rule amendments are outlined in section 3.2 above and attachment 1 of its rule change request.

QUESTION 2: PROPOSED SOLUTION

1. Are MLPL's proposed rule amendments appropriate to address the problem?
2. Is there a risk of any unintended consequences in implementing MLPL's proposed solution of both applying NER chapter 6A to Intending TNSPs and, more specifically, MLPL's proposed amendment' to clause S6A.2.1(d)(2)?
 - a. For example, does MLPL's proposal sufficiently address the risk of opening up the opportunity for a range of Intending TNSPs to lodge network revenue proposals for uncertain projects to the AER?

5.3 What are the alternatives?

The Commission may explore possible alternatives to MLPL's proposal as part of our consultation process and assessment.

For example, rather than amending these two regulatory mechanisms to accommodate Intending TNSPs, the apparent gap in the regulatory framework could potentially be addressed by creating a new regulatory mechanism as a 'bridge' for Intending TNSPs to establishing a RAB under Schedule 6A.2. This approach would avoid the need to complicate other parts of the Chapter 6A framework – and avoid the risk of any potential unintended consequences.

Schedule 6A.2 of the NER is the regulatory mechanism designed to establish a RAB for a transmission system that has not been the subject of a revenue determination, so that the economic regulation framework can then apply.

QUESTION 3: ALTERNATIVE SOLUTIONS

1. Are there more appropriate solutions to address the problem identified by MLPL? For example, what could a new 'bridging' mechanism look like under the broader NER Chapter 6A framework?
 - a. Should this solution be limited to actionable ISP projects?

2. Is there a risk of any unintended consequences associated with the alternative solution/s?
3. Are there other mechanisms to address the risk of speculative submissions for revenue determinations by Intending TNSPs.

6 CONSULTATION PROCESS

Submissions to this consultation paper are due by 2 June 2022. The key project milestones are highlighted in the table below.

Table 6.1: Key Dates

MILESTONE	DATE (INDICATIVE)
Close of first round submissions	2 June 2022
AEMC to publish draft determination	4 August 2022
Close of second round submissions	15 September 2022
AEMC to publish final determination	27 October 2022

6.1 Lodging a submission

Written submissions on the rule change request must be lodged with Commission by 2 June 2022 online via the Commission’s website, www.aemc.gov.au, using the “lodge a submission” function and selecting the project reference code ERC0343.

The submission must be on letterhead (if submitted on behalf of an organisation), signed and dated.

Where practicable, submissions should be prepared in accordance with the Commission’s guidelines for making written submissions on rule change requests.⁵⁰ The Commission publishes all submissions on its website, subject to a claim of confidentiality.

All enquiries on this project should be addressed to Viashin Govender on (02) 8296 7800 or viashin.govender@aemc.gov.au.

⁵⁰ This guideline is available on the Commission’s website www.aemc.gov.au.

ABBREVIATIONS

AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
Commission	See AEMC
CPA	Contingent project application
ISP	Integrated system plan
MLPL	Marinus Link Pty Ltd
MW	megawatt
NEL	National Electricity Law
NEO	National electricity objective
NSP	Network service provider
RAB	Regulated asset base
RIT-T	Regulated investment test for transmission
TNSP	Transmission network service provider