SUBMISSION TO THE CONSULTATION PAPER-ESTABLISHING REVENUE DETERMINATIONS FOR INTENDING TNSPS

stakeholder feedback template

The template below has been developed to enable stakeholders to provide their feedback on the issues that the Commission seeks feedback on in the consultation paper and any other issues that they would like to provide feedback on. The AEMC encourages stakeholders to use this template to provide feedback on issues raised. This template is not exhaustive and therefore stakeholders are encouraged to comment on any additional issues or suggest additional solutions. Stakeholders should not feel obliged to answer each question, but rather address those issues of particular interest or concern. Further context for the questions can be found in the consultation paper.

SUBMITTER DETAILS

|  |  |
| --- | --- |
| **ORGANISATION:** | Click or tap here to enter text. |
| **CONTACT NAME:** | Click or tap here to enter text. |
| **EMAIL:** | Click or tap here to enter text. |
| **PHONE:** | Click or tap here to enter text. |
| **DATE** | Click or tap here to enter text. |

project DETAILS

|  |  |
| --- | --- |
| **NAME OF RULE CHANGE:** | Establishing revenue determinations for intending TNSPs |
| **PROJECT CODE:** | ERC0343 |
| **PROPONENT:** | Marinus Link Pty Ltd |
| **SUBMISSION DUE DATE:** | 2 June 2022 |

**Section 5.1-** What’s the problem Marinus Link Pty Ltd (MLPL) is trying to solve?

|  |  |
| --- | --- |
| **Problem statement** | |
| 1. Is the problem definition clear?    1. 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? | Click or tap here to enter text. |
| 1. 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)? | Click or tap here to enter text. |

**Section 5.2**- Does MLPL’s proposed solution address the problem?

|  |  |
| --- | --- |
| **Proposed solution** | |
| 1. Are MLPL’s proposed rule amendments appropriate to address the problem? | Click or tap here to enter text. |
| 1. 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)?    1. 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? | Click or tap here to enter text. |

**Section 5.3**– What are the alternatives?

|  |  |
| --- | --- |
| **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?    1. Should this solution be limited to actionable ISP projects? | Click or tap here to enter text. |
| 1. Is there a risk of any unintended consequences associated with the alternative solution/s? | Click or tap here to enter text. |
| 1. Are there other mechanisms to address the risk of speculative submissions for revenue determinations by Intending TNSPs? | Click or tap here to enter text. |

**OTHER COMMENTS**

|  |  |
| --- | --- |
| 1. Please provide any further comments on this report. | Click or tap here to enter text. |