

Attention:
ElectraNet Pty Ltd
East Terrace Adelaide
SA 5000

Dear Sir/Madam,

31st August 2018

Ref: SOUTH AUSTRALIAN ENERGY TRANSFORMATION PADR FEEDBACK

Introduction

Further to our 9th August feedback submission to ElectraNet I am taking the opportunity to make this further submission. We make this further submission having examined the modeling data/presentations notified to Ausker on the 28th August 2018 and matched that to our reading of the Energy Transformation PADR released at the end of June.

Ausker's Interest

Firstly let me state our particular interest in this PADR. The Ausker Group of companies has various interests in South Australia, particularly on the Eyre Peninsula where amongst other activities Ausker energies wishes to develop a wind farm. We are concerned that in publishing the Energy Transformation RIT-T PADR ElectraNet may be signaling a reduced commitment to investment in intra regional transmission investment in South Australia. Intra-regional investment is sorely required in the Eyre Peninsula where the failing existing legacy transmission assets cause considerable disruption and additional costs to existing communities and businesses. The limited capacity of these same failing assets also decreases the future development prospects of this resource rich region.

Support of the Principal Conclusions

The principal conclusions of the SA Energy Transformation RIT-T PADR and the preferred Option 3i are welcome to the Ausker Group. We fully support the construction of the proposed 330 kV line from Robertstown through to Darlington Point via Buronga and on to Wagga Wagga and believe it will benefit the electricity users of both South Australia and New South Wales. Similarly we believe that the addition of the other measures such as the synchronous condensers referenced in the PADR to the grid bring obvious benefits to the South Australian system.

Ausker's Concerns regarding Solutions

When reading the SA Energy Transformation PADR and the recently received supplementary information we were disturbed by the potential for the PADR to be used to put into question certain intra-regional transmission investments, specifically that on the Eyre Peninsula. While some breakdown of the nature and location (state) of the capital investments is available the documents do not provide detail on the nature or location of the "Avoided transmission network capital expenditure" though a portion is identified as a

“Committed Project”. The PADR does not specifically mention the Eyre Peninsula for avoided investment, indeed in §9.2 it references only “the Murray River and Riverland REZs” which given the proposed transmission line route makes sense. However the repeated delays in the release of the final Project Assessment Conclusions Report for the Eyre Peninsula Electricity Supply Options RIT-T (now due sometime in September?) give us reason to fear that other intra regional transmission lines including that on the Eyre Peninsula may be caught up in the same reasoning. It appears that ElectraNet is now distancing itself from the “highest ranked preferred option” presented in the Nov 2017 PADR and may seek to propose less robust solutions. Given that the relevant PADR had a focus on particular solution (Option 4B) we do not believe that presenting a lesser solution can be considered to have had the appropriate consultation for a final report. We have not been able to find any material factor, change or development in the various documents related to the two PADRs that puts into question the conclusion that Option 4B announced in 2017 is the most appropriate for the Eyre Peninsula.

Ausker’s Concerns regarding Timing

Included in ElectraNet’s forum presentation are a number of slides presented by AEMO on its recently released ISP. Parts of this presentation (and the ISP itself) show investment in the intra-regional transmission line in the Eyre Peninsula not occurring until after 2040 rather than the 2021 horizon previously published by ElectraNet for this work. Further the transmission lines shown on the diagrams only progress halfway down the peninsula stopping at the Yadnarie substation without continuing on to Port Lincoln. Apart from the obvious affront to the major population centre of the region this would represent an intolerable delay in resolving, at least in part, the critical reliability and capacity issues plaguing the region and deny it an opportunity to develop industries and businesses.

Summary

In summary, it would be a severe disappointment to Ausker and the industries and communities of the Eyre Peninsula if the development of the SA-NSW interconnector was used as a pretext to delay investment in or to implement a less robust solution for the Eyre Peninsula than those industries and communities currently anticipate from ElectraNet’s prior publications. Specifically for Ausker it would mean that its proposed 360 MW wind farm investment, an investment in the range of \$600M, would be frustrated. The jobs and network support opportunities that people in the area would otherwise enjoy would disappear with it.

Yours faithfully,



Jacob Cherian.
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