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Mr Hugo Klingenberg  
ElectraNet  
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Hutt Street Post Office  
ADELAIDE SA 5000

**By Email:** [consultation@electranet.com.au](mailto:consultation@electranet.com.au)

Dear Mr Klingenberg,

**South Australian Energy Transformation Regulatory Investment Test for Transmission  
Project Specification Consultation Report**

Powerlink is pleased to make this submission in response to ElectraNet's Project Specification Consultation Report (PSCR) for the South Australian Energy Transformation Regulatory Investment Test for Transmission (SAET RIT-T).

Powerlink is an active member of a Working Group established by ElectraNet to perform the joint planning activities required for this RIT-T. The membership of this Working Group includes representation from TNSPs of the interconnected NEM, industry experts and AEMO as the jurisdictional planner for the Victorian region.

As a member of the Working Group, Powerlink is committed to:

- refining the scope and likely cost of the credible HVDC VSC option between South Australia and Queensland;
- modelling the HVDC VSC link and converter station control systems to quantify the impact that prudent post-contingent control action on the link may have on transient, voltage, oscillatory and thermal limits of existing AC interconnectors; and
- identifying upstream limitations within the Queensland network and scoping and costing solutions to these limitations.

In the normal course of conducting such an assessment, a robust scope, estimate and technical assessment of other inter-regional network options between South Australia and Victoria and New South Wales respectively is expected to be undertaken, as well as an assessment of various non-network options that may emerge through the RIT-T process (including combinations thereof).

The assessment should also extend to credible network and non-network options against the "do nothing" option for a range of scenarios, including possible future State-based renewable energy

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targets. This is necessary to establish the relative merits of various options and to establish the critical variables and dependencies that may impact their ranking.

In making these assessments the economic analysis should capture the full range of benefits and costs associated with each of the credible options. It is also essential that stakeholders have sufficient transparency to verify that the market modelling analysis is robust. This requires checks and iterations to ensure that the least cost plantings of new entrants and generation retirements for each scenario and option can be validated as optimal using the time sequential dispatch model. The time sequential dispatch model must take into account all relevant intra-regional limitations when making these assessments.

Powerlink notes that the credible network options identified in the PSCR are large projects that have the potential to unlock significant benefits by connecting geographically and energy source diverse regions. Consistent with the RIT-T principles and the National Electricity Objective, the assessment must take into account the economic impact for all parties who produce, consume and transport electricity in the National Electricity Market, and not only those of a single region or a single sector.

Under the Rules, the absence of a proponent does not exclude an option from being considered a credible option. In the event that a SA-Queensland interconnector is demonstrated to be the preferred option, Powerlink will participate in a manner consistent with its established role in developing, owning and operating the high voltage electricity network in Queensland.

If you have any questions with respect to this submission please call Jennifer Harris on (07) 3860 2667.

Yours sincerely,



Kevin Kehl

**EXECUTIVE GENERAL MANAGER STRATEGY AND BUSINESS DEVELOPMENT**

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