

7 August 2024

Mr Kris Funston  
General Manager  
Australian Energy Regulator  
GPO Box 520  
Melbourne VIC 3001

Dear Mr Funston

**Re: Network Support Pass Through Application for 2023-24**

The Australian Energy Market Operator (AEMO) declared a Notice of Inertia and Fault Level Shortfalls in Tasmania (AEMO Declaration) in November 2019 and additionally in 2021 issued the [2021 Notice of Tasmania system strength and inertia shortfalls](#). To address the shortfalls, and working closely with the AEMO and the Australian Energy Regulator (AER), TasNetworks entered into an amended inertia and system strength services contract with [REDACTED]. This network support pass through application for 2023-24 is for payments made by TasNetworks under this contract, being a positive pass through amount of \$417,440. This represents the amount that TasNetworks proposes to recover from customers as a revenue under-recovery when setting transmission prices for 2025-26.

The pass through of network support costs to Transmission Network Users is required under clause 6A.7.2 of the National Electricity Rules. The AER established a Procedural Guideline for Preparing a Transmission Network Support Pass Through Application (Guideline) to provide further direction on this process. This network support pass through application for the regulatory year concluding 30 June 2024 has been prepared in accordance with these provisions and addresses the specific information requirements of the Guideline, as outlined in Appendix A. The relevant calculations are contained in a separate spreadsheet included as Appendix B of this application, in accordance with the reporting template accompanying the Guideline.

If you have any questions regarding this application please contact TasNetworks' Head of Regulation, Chantal Hopwood, [REDACTED]

Yours sincerely

[REDACTED]

Michael Westenberg  
Executive Finance and Regulation

## Appendix A: Response to National Electricity Rules and Procedural Guideline for Preparing a Transmission Network Support Pass Through Application

### 1. Actual network support expenditure

A total amount of \$375,640 was expended on network support during 2023-24 (\$Jun 2024). This total represents direct costs incurred in the provision of network support services under the procurement contract with [REDACTED] during the 2023-24 regulatory year. No network support allowance was included in the Australian Energy Regulator (AER)'s final 2019-2024 revenue determination for TasNetworks.

### 2. Network support pass through amount (\$m) including time cost of money calculations

A positive network support event (i.e., under-recovery) therefore occurred in respect of 2023-24 \$383,174<sup>1</sup>. After the required time value of money adjustments, as detailed in the Guideline in both section 3.10, this positive pass through amount totals \$417,440. This represents the amount that TasNetworks proposes to recover from customers as a revenue under-recovery when setting transmission prices for 2025-26.

### 3. Reasons for network support payment

The network support payment request for the 2023-24 financial year reflects the full year impact of the charges payable under the inertia and system strength services procurement contract with [REDACTED]

The need for this contract was not foreseen at the time of development of TasNetworks' Revenue Proposal for the 2019-2024 regulatory control period. The Australian Energy Market Operator (AEMO) Notice of Inertia and Fault Level Shortfalls in Tasmania was issued on 13 November 2019 and updated on 7 May 2021, well after arrangements for TasNetworks' current revenue determination had been finalised.

### 4. Network support event

The amount of network support payment in the 2023-24 financial year does not include any amount that is a substitute for a network augmentation where an allowance for capital expenditure had been provided for in TasNetworks' revenue determination. Nor does the amount of network support payment in the 2023-24 financial year include an approved pass-through amount arising from an inertia shortfall event or a fault level shortfall event.

### 5. Verification of actual network support expenditure (audited statutory accounts)

The information presented in this application is provided on the basis of audited statutory financial statements. The expenses incurred are also subject to the annual audit of TasNetworks' regulatory accounts, which will be submitted to the AER by the end of October 2024.

### 6. Solely as a consequence of the positive network support event

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<sup>1</sup> Applied half-year 2023-24 CPI escalation

The expense relating to this network support pass through application would not have been incurred were it not for the AEMO Declarations. To ensure compartmentalisation of the positive network support event, network operating procedures have been established to create data sets that specifically determine and capture costs. The key data set elements which now form part of SCADA<sup>2</sup> interfaces between TasNetworks, the AEMO and [REDACTED] are: unit availability (to provide services), enablement/withdrawal instructions (on an individual unit basis) and the actual real time provision of services (both inertia and system strength). This information, along with spot market price data, has been used to determine compensation payments on a quarterly basis in accordance with the agreed methodologies documented in the service agreement with [REDACTED].

## 7. Date network support pass through application is submitted to AER

The date of lodgement of this application is 7 August 2024.

## 8. Details on efficiency of contractual arrangements

The network support services arrangement with [REDACTED] was put in place following a competitive Expression of Interest (EOI) process.

TasNetworks initiated an EOI process with the intent of identifying willing and able service providers in the Tasmanian region in the event that one or more shortfalls were to be declared. This process was initiated in August 2019 [REDACTED]

The EOI process was run in advance of the formal shortfall declaration on 13 November 2019 as AEMO and TasNetworks, through joint planning activities, had identified the likely existence of shortfalls. TasNetworks, therefore, deemed it prudent to identify potential solutions ahead of the formal declaration process, as the timeframe for implementation was expected to be relatively short. This proved to be the case as services were required by AEMO to be made available by 1 April 2020.

Following AEMO's [2021 Notice of Tasmania system strength and inertia shortfalls](#) [REDACTED]

As the AEMO May 2021 May shortfalls are in addition to the shortfalls already addressed by TasNetworks following AEMO's November 2019 declaration, the principal Inertia and System Strength Service Agreement [REDACTED]. This amended contract reflects standard industry terms and conditions and is available for AER review. The technical schedules to the agreement provide the costing methodologies that are used for the determination of compensation payments for each category of service provided.

The Inertia and System Strength Service Agreement was due to expire at midnight on 14 April 2024. TasNetworks [REDACTED] entered into a new agreement in order to extend existing arrangements from 14 April 2024 until 1 December 2025.

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<sup>2</sup> SCADA - Supervisory Control And Data Acquisition

## 9. Decisions affecting the magnitude of the network support event

In conjunction with AEMO, TasNetworks designed and operationalised control room procedures and monitoring tools which, in addition to satisfying ongoing system security requirements, have the objective of minimising the utilisation of contracted services. TasNetworks' document Standing Instruction 119 "*Managing low system strength and inertia operating conditions*" is the reference procedure and describes the decision-making processes involved with enabling and withdrawing contracted services from use. The decision-making processes are strongly guided by a number of automated analysis tools which provide various alarms and prompts to operators, based on the real time operating conditions being experienced across the Tasmanian network.

The provision of a robust and formalised system to manage the ongoing utilisation of contracted services inherently reduces the likelihood that omissions or failures to act will contribute to cost inefficiencies. This means only efficient levels of contracted services are utilised as and when needed, with the need being a by-product of market outcomes that are beyond the immediate control of TasNetworks.

## Appendix B: Relevant calculations according to the Procedural Guideline for Preparing a Transmission Network Support Pass Through Application



### Appendix B: Network support pass through calculations

Nominal vanilla WACC (2024–2025)	5.84%
Nominal vanilla WACC (2025–2026)	5.94%
2019–2020 CPI (Dec to Dec)	1.84%
2020–2021 CPI (Dec to Dec)	0.86%
2021–2022 CPI (Dec to Dec)	3.50%
2022–2023 CPI (Dec to Dec)	7.83%
2023–2024 CPI (Dec to Dec)	4.05%

	\$ millions
<b>Allowance</b>	
Forecast opex allowance for network support payments (\$Jun 2022)	-
1 <i>Adjustment: Forecast opex allowance for network support payments (\$Jun 2024)</i>	-
<b>Actual payments</b>	
Actual network support payments	318,473
Other costs (administration)	57,167
<i>Actual network support payments</i>	<i>375,640</i>
2 <i>Adjustment: Actual network support payments (\$Jun 2024)</i>	<i>383,174</i>
3 <b>Difference (under recovery)</b>	<b>383,174</b>
4 Interest payment	34,265
5 <b>Positive pass through amount</b>	<b>417,440</b>

#### Notes

The AER's approach to calculating the 2023-24 network support pass through amount is as follows:

- 1 The TNSP should escalate the forecast network support payment allowance (\$Jun 2022) by two years CPI to end of year terms (\$Jun 2024).
- 2 The TNSP should escalate the value of actual network support payments by the relevant escalation factor to end of year terms (\$Jun 2024).
- 3 Difference equals the adjusted actual payment less the adjusted allowance (2–1).
- 4 The interest payment - WACC - applies to the difference (3) for a time period of 1.5 years.
- 5 The pass through amount is based on the difference with an adjustment accounting for the time cost of money (interest).

Please refer to chapter 3 of the guidelines for the reasoning behind the AER's calculations.