Grid Comms Microwave Radio Edge Nth QLD and Far North Replacements ERGON

Justification Statement

22/ 10/ 2024

ERGON ENERGY NETWORK
Part of Energy Queensland

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DOCUMENT VERSION

Version Number	Change Detail	Date	Updated by
1.0	Approved Version	15/11/2024	General Manager Grid Technology

1. SUMMARY

Title	Grid Comms MW Radio Edge NQ FN
DNSP	Ergon Energy
Expenditure category	☒ Replacement ☐ Augmentation ☐ Connections ☐ Non-network
Identified need *(select all applicable)*	☐ Legislation ☐ Regulatory compliance ☒ Reliability ☐ CECV ☒ Safety ☐ Environment ☒ Financial ☐ Other An ongoing program to proactively replace aged and unsupported microwave radio equipment across the North and Far North operating regions. Proactive replacement ensures a reduction of time and costs associated with in-service failures as assets age beyond vendor support and experience an increased failure rate.
Expenditure	
Benefits	This proactive program will reduce costs associated with managing microwave radio equipment failure in a 'fail-fix' nature. Proactive replacement provides the spare assets required to be held and reduces the extent of service outage.

Year	2025-26	2026-27	2027-28	2028-29	2029-30	2025-30
$m, direct 2022-23	$0.84M	$0.84M	$0.84M	$0.84M	$0.84M	$4.24M

2. PURPOSE AND SCOPE

This document recommends the optimal capital investment necessary for replacement of obsolete Microwave Radio (MW) telecommunications network assets. This is a preliminary business case document has been developed for the purposes of seeking funding for the required investment in coordination with the Ergon Regulatory Proposal to the Australian Energy Regulator (AER) for the 2025-30 regulatory control period. Prior to investment, further detail will be assessed in accordance with the established Energy Queensland investment governance processes. The costs presented ($4.24M) are in (2022/23) direct dollars.

3. BACKGROUND

3.1. Asset Population / Site Summary / Capability

Ergon Energy's Telecommunications Network Assets enable mission critical real-time voice and data communications to allow automation, remote monitoring and control of the power network, enable ability to co-ordinate safe and efficient work activities as well as extend the reach of corporate information systems across a common infrastructure.

Ergon Energy utilises microwave radio links to supply mission critical real-time voice and data communications long distances where it is not cost effective to install fibre optic cable.

This program covers replacement of obsolete Microwave radio equipment, prioritising assets with the highest volume of business-critical services. Ergon Energy is aware of the need to effectively manage these assets, some are now approaching, have reached or have passed their original design life.

This is an ongoing risk-based replacement program that is divided into multiple projects to address differing needs, priorities and completion timings. This program is consistent with the Telecommunication Network Asset Management Plan.

3.2. Asset Management Overview

Ergon Energy has a total of 128 edge microwave (MW) radio assets across the North and Far North operating areas, with the vast majority being installed between 2007 and 2014 under a under a project called UbiNet. These links are installed over a combination of sites and infrastructure that is either directly owned by Ergon Energy or leased from third parties.

Asset Class / Technology Type	Total Quantity	2025-30 End of Life Quantity	Replacement Strategy
[redacted]	84	84	Proactive replace critical sites strategically – to use as spares for remaining fleet.
[redacted]	9	9	
[redacted]	24	24	
Other Edge Assets	11	0	N/A

Below is the age profile for all capacity and model types of Ergon Energy's Microwave radio fleet.

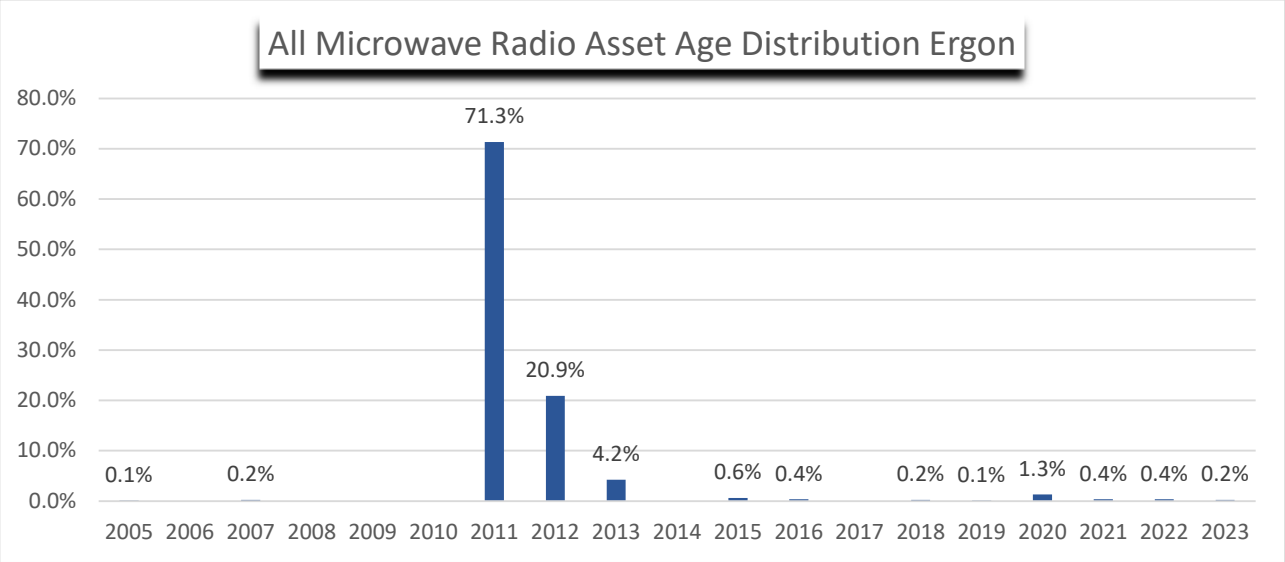


Figure 1 Microwave Radio Age Profile all assets (Core and Edge)

3.3. Asset Failure Rates

Asset performance considerations for the Microwave radio fleet is as follows:

- The MW Radio components comprise both Indoor and Outdoor electronic components installed in rugged environments that deteriorate with age.
- For the MW Radio components which have gone End of Life, manufacturers have ceased support and very limited options exist for equipment repairs and refurbishment.
- Large portion of the fleet 87% went End of Sale in 2015 with End of Support occurring in 2025-2026.
- Like for like replacements do not exist for both Indoor and Outdoor MW radio equipment resulting in increased complexities associated with upgrading to current contracted equipment from legacy equipment.
- The manufacturer has released the bulletin Appendix 3 advising the [redacted] radio systems have been susceptible to a software bug that leads the system to malfunction due to the number of write cycles to the non-volatile memory which is much larger than planned therefore significantly reducing the asset life.

  Ergon have already experienced several failures on this platform which this bug is believed to be the root cause and have implemented the manufacturers recommended action.
- Combined average failure rate during the 5 year period between 2019 and 2024 has been on average 2.3% however is anticipated to increase to 4.5% as the assets age due to this known manufacturer defects that leads the system to completely fail.

  It is expected due to this issue Ergon will continue to see failures increase on this platform as it ages. The hardware has gone end of life, manufacturers have ceased support and very limited options exist for equipment repairs and refurbishment.

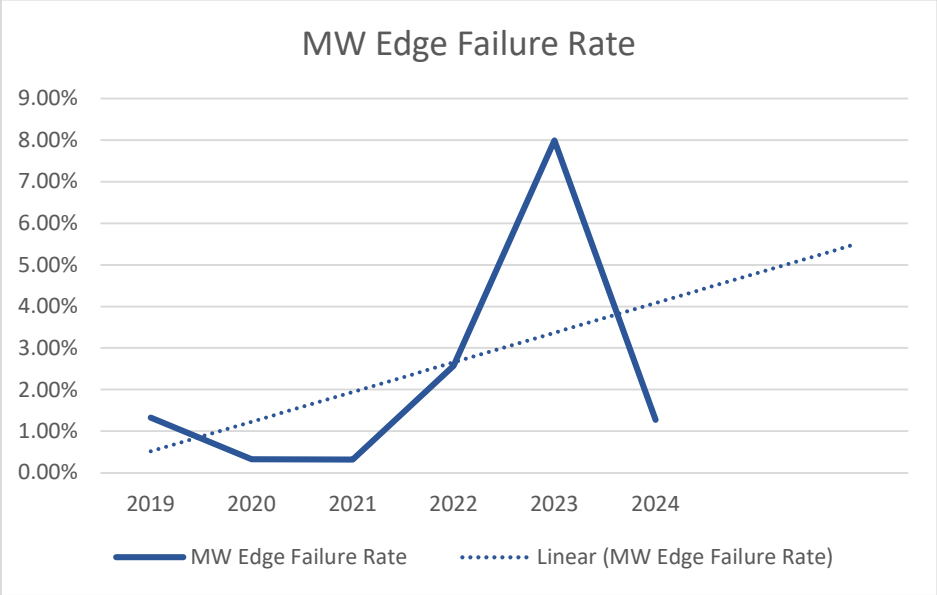


Figure 2 Microwave Edge Radio Asset Failure rate

4. IDENTIFIED NEED

4.1. Summary

This program seeks to manage risks and costs associated with provision of comms equipment by replacing equipment ahead of in-service failure to generate spares to extend the life of the remaining fleet. Not proceeding with the program will require expensive reactive replacement when units fail in-service and no spares are available.

Ergon's fleet of microwave radio links provide the underlying bearer capacity for provision of telecommunications services and connectivity to multiple substations, depots and P25 sites, in addition to this it provides duplicate and diverse communications capacity for Teleprotection services required for protection systems to adhere to the NER (National Electricity Rules).

These assets experience conditional issues which can impact their expected operational life or result in in-service asset failure and outages. Failure to address these known conditional issues with appropriate asset management practices could result in the loss of critical services that are provisioned for safety and the support of basic services for the efficient completion of operational and supervisory activities.

Some of the potential consequences which can occur because of microwave radio system outage include:

- Loss of control and visibility of substation(s)
- Increased outage duration due to lack of SCADA functionality.
- Loss of interrogation/control of protection relays
- Loss of operational voice communications using substation phones and P25 radios.

- Increased outage duration due to limited communications capacity.
- Reduction of network reliability and loss of contingency communications resulting in cascading network outages.
- Loss of diverse high-speed telecommunications for NER governed protection systems requiring de-energisation or abnormal network configurations.

4.2. Options Analysis

Ergon Energy evaluated multiple options as follows to determine the most prudent asset management approach for the MW radio based assets. These options are summarised in the table below and detailed further in each subsequent section.

Option	Qty Proactive	Total Proactive Cost	Qty Reactive	Total Reactive Cost	Total Cost	NPV
Option 1 (Proposed) - Spares mine 4% *Mine spares in alignment with failure rate projections ~4%*	24	$4.24M	0	$0	$4.24M	$0.77M
Option 2 – Hybrid proactive and reactive replacement *Accept AER proposed 37% reduction. Resulting in 14 x proactive and 10 x reactive replacements.*	14	$2.67M	10	$3.53M	$6.20M	-$2.72M
Option 3 - Wholesale replace *Proactive replacement of all obsolete assets*	108	$11.44M	0	$0	$11.44M	-$5.29M
Option 4 – Counterfactual *No proactive replacement in place*	0	$0	24	$8.58M	$8.58M	-$7.23M

4.2.1. Option 1 (Proposed) – Spares mining aligned with projected failure rates

This proposed option is based on allowing for a failure rate of equipment at 4.5% per annum in alignment with projected failure rates. This option will allow the existing MW radio fleet to continue to remain in service without significant change to ultimately extend the life of the existing infrastructure.

To achieve this Ergon intends to continue the existing practice of strategic spares mining which involves proactive replacement and recovery of operational MW radio assets for the likely amount required to support failure in service.

The approach to prioritise assets for recovery has strong focus on alleviating deliverability issues through targeted selection of assets that are simple to recover have reduced complexity based on where it is located and services it provides.

It is proposed that Ergon proactively replace 24 unsupported and aged microwave radio links with the current contract microwave radio equipment and utilise the recovered equipment as spares to support the remaining fleet.

Total cost of this program $4,240,296.

4.2.2. Option 2 – Hybrid proactive and reactive replacements

This option is accepting the AERs 37% reduction in the program ($2.67M) and only replacing 14 assets. For this option we would be likely performing some reactive replacements of between 8 and 12 units. If we assume 10 units would be replaced the actual expenditure that would be required would be the proactive program and the reactive program to cover the fail-fix where spares would not be available.

Simply scaling the counter factual case costs based on the percentage of the program that would be done reactively suggest that the total costs for this program likely to cost $2.67M (proactive component) + $3.53M (reactive component) = $6.20M (total).

4.2.3. Option 3 – Wholesale replacement

Ergon considered performing wholesale proactive replacement of all obsolete MW Radio assets based on age, condition and vendor support removal as an alternate to the proposed multi-faceted approach that replaces a smaller subset however the program was grossly ($11.44M) more expensive than the proposed program and was rejected.

4.2.4. Option 4 – Counterfactual - Reactive replacement only

The counterfactual considers the continued use of the current infrastructure platform without a proactive program to generate spares ahead of failure. This means that once we have depleted all spares on failure the radio equipment will need to be replaced with new non-compatible equipment.

Should failure rates continue at 4.5% would result in approximately 24 failures over the 5 year period requiring reactive return to service action which is estimated to cost at least 2 times to restore services due to assets having gone end of sale, remaining spares eventually becoming depleted and no like for like replacements are available. There are several factors that can lead to these significantly higher costs:

- Reactively replacing microwave equipment will cost twice as much as proactive replacement and fail then fix process due to:-
    - Proactive programs can be scheduled to occur at times when staff were performing other works at the site resulting in lower expenditure.
    - Significant amounts of overtime is always required to bring the services back on line in a suitable time frame for these reactive replacements, that in the most part can be avoided for a proactive program.
    - Inefficiencies that are caused to the work that Staff have been taken off of, as they demobilise to perform the emergency works and then move back to normal operations.
    - to current contracted equipment is not a like for like replacement. It involves replacing both indoor and outdoor equipment located on tower/structures, at minimum both ends of the links and often multiple sites along the string require

replacement of legacy assets due to differences in protocols used to manage equipment.

- Reactively replacing MW radio's can result in longer network downtime, which adds indirect costs due to service outages, business impacts and the urgency of securing specialised resources and equipment to implement the migration. Pole or tower mounted equipment may not be repairable or replaceable for several days due to safety concerns or accessibility associated with inclement weather.
- The absence of proactive capital investment in the 2025-30 regulatory period would mean that over time the current infrastructure would no longer be fit-for-purpose and may become incompatible with new and emerging systems and technologies used by Ergon and third parties.

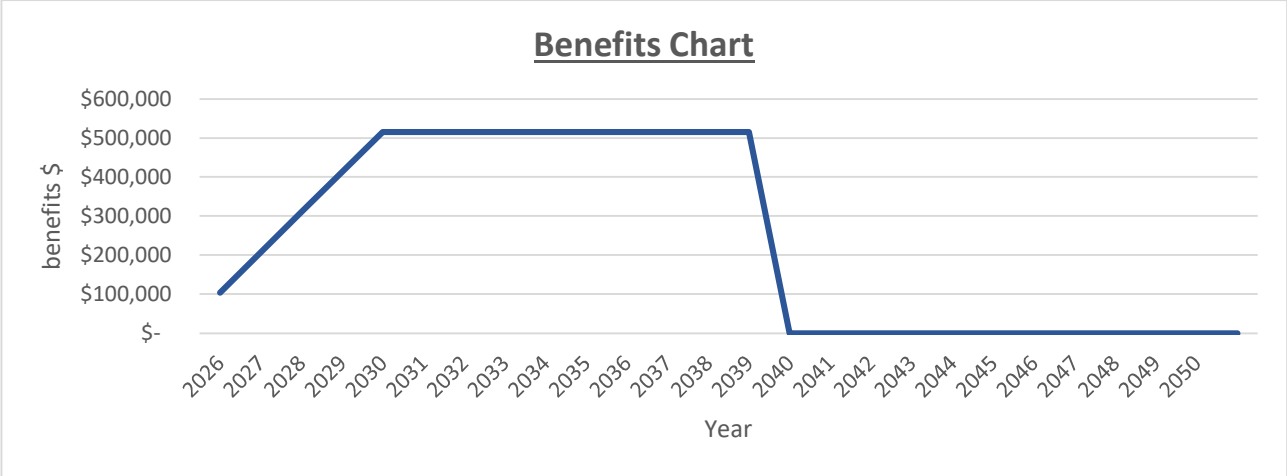
The total estimated cost of the counterfactual case over the period is $8,586,599.

4.3. Risks

Table below outlines the risk assessment for the counterfactual scenario with no proactive program in place to address conditional and age issues (i.e. all work is done as reactive):

Risk Scenarios	Description of Risk
MW Radio hardware or software defects occur on aged unsupported equipment results in loss of protection, SCADA or other operational service for an extended period of time.	With the continued use of unsupported and aged microwave radio equipment services reliant on this equipment for diversity or primary connectivity (i.e. spurred substations) will be out of service for extended periods of time in the event of an asset failure. There is an estimated likelihood that on a yearly basis 5% of the at-risk assets will experience either hardware or software defects that will result in extended network outages that require an emergency response costing twice as much to fix compared to resolving as part of planned proactive work due to complexities associated with upgrading to current contracted equipment from legacy equipment.
Failure of unsupported MW Radio equipment causing extended SCADA outages resulting in delays to both planned and unplanned restoration works.	Hardware or software failure on obsolete MW radio asset hinders ability to remotely manage the power network resulting increased labour costs and delays in service restoration impacting customer reliability totalling 2 hours of an average 22kV feeder (2000kW) with an assumed VCR of $52 per kwh with a likelihood of 1% p.a.
Failure of microwave radio assets providing primary connectivity to Ergon depot with no available spares results in extended periods of reduced operational capacity.	Ergon is reliant on microwave radio for connectivity to remote Depot locations; should these microwave radios fail, employees would experience a reduce capacity to access corporate and operational systems for the duration of the outage. Delays in service restoration totalling 40 hours for 20 staff resulting in a 20% reduced efficacy for this period with a likelihood of 1.8%

The table below outlines the cost benefits for the preferred option which has only been modelled over the estimated asset life of ~12 years.



5. ECONOMIC ANALYSIS

5.1. Cost Summary 2025-30

Table 1 Cost summary 2025-30

Option	2025-26	2026-27	2027-28	2028-29	2029-30	Total 2025-30
Option 1 – Spares mining	**$848,059**	**$848,059**	**$848,059**	**$848,059**	**$848,059**	**$4,240,296**
Option 2 – Hybrid replace	$1,240,993	$1,240,993	$1,240,993	$1,240,993	$1,240,993	$6,204,966
Option 3 – Wholesale replace	$2,289,760	$2,289,760	$2,289,760	$2,289,760	$2,289,760	$11,448,799
Option 4 – Reactive replace	$1,717,320	$1,717,320	$1,717,320	$1,717,320	$1,717,320	$8,586,599

5.2. NPV Analysis

The NPV calculations have been modelled as a complete program, with benefits realised through proactive program delivery calculated.

The resulting NPV value calculated for the proposed program was $779,228.

Table 2 NPV analysis

Option	NPV	Discount rate		Benefits	
		2.5%	4.5%	125%	75%
Option 1 – Spares mining	$779,228	$1,049,027	$548,825	$1,867,646	-$309,189

Option	NPV	Discount rate		Benefits	
		2.5%	4.5%	125%	75%
Option 2 – Hybrid replace	-$2,724,821	-$2,725,473	-$2,710,756	-$2,098,376	-$3,351,266
Option 3 – Wholesale replace	-$5,297,323	-$5,326,125	-$5,246,859	-$4,208,905	-$6,385,741
Option 4 – Reactive replace	-$7,238,245	-$7,593,931	-$6,903,683	-$7,238,245	-$7,238,245

APPENDICES

Appendix 1: Alignment with the National Electricity Rules

Table 3 Recommended Option's Alignment with the National Electricity Rules

NER capital expenditure objectives	Rationale
A building block proposal must include the total forecast capital expenditure which the DNSP considers is required in order to achieve each of the following (the capital expenditure objectives):	
6.5.7 (a) (1) meet or manage the expected demand for standard control services over that period	
6.5.7 (a) (2) comply with all applicable regulatory obligations or requirements associated with the provision of standard control services;	As indicated in section 4, this proposal ensures that safety obligations, reliability obligations and protection requirements are met by providing an appropriate, economically efficient program of works to prevent in-service failure of physical linear media assets. Without this program, these obligations would be at significant risk of being breached.
6.5.7 (a) (3) to the extent that there is no applicable regulatory obligation or requirement in relation to: (i) the quality, reliability or security of supply of standard control services; or (ii) the reliability or security of the distribution system through the supply of standard control services, to the relevant extent: (iii) maintain the quality, reliability and security of supply of standard control services; and (iv) maintain the reliability and security of the distribution system through the supply of standard control services	This program of work ensures the integrity of communications functions that support SCADA, protection, voice and data communications systems. They are critical in the provision of network reliability in support of MSS and safety net security and reliability targets.
6.5.7 (a) (4) maintain the safety of the distribution system through the supply of standard control services.	This program of work ensures the integrity of communications functions that support SCADA, protection, voice, and data communications systems. They are critical in ensuring safety through correct protection operation, and through the availability of voice and data communications.
NER capital expenditure criteria	**Rationale**
The AER must be satisfied that the forecast capital expenditure reflects each of the following:	
6.5.7 (c) (1) (i) the efficient costs of achieving the capital expenditure objectives	The options considered in this proposal take into account the need for efficiency in delivery. The preferred option has utilised a delivery approach that provides for bundling of work in terms of both timing and geography to enable a lower cost delivery compared to other options. It generally avoids emergency replacements that incur higher costs by enabling efficient use of labour resources in the delivery of the work programs. Specialised contractors are utilised as appropriate to ensure that costs are efficiently managed through market testing. Cost performance of the program will be monitored to ensure that cost efficiency is maintained.

NER capital expenditure objectives	Rationale
	The unit costs that underpin our forecast have also been independently reviewed to ensure that they are efficient (Attachments 7.004 and 7.005 of our initial Regulatory Proposal).
6.5.7 (c) (1) (ii) the costs that a prudent operator would require to achieve the capital expenditure objectives	The prudency of this proposal is demonstrated through the options analysis conducted. The prudency of our CAPEX forecast is demonstrated through the application of our common frameworks put in place to effectively manage investment, risk, optimisation and governance of the Network Program of Work. An overview of these frameworks is set out in our Asset Management Overview, Risk and Optimisation Strategy (Attachment 7.026 of our initial Regulatory Proposal).
6.5.7 (c) (1) (iii) a realistic expectation of the demand forecast and cost inputs required to achieve the capital expenditure objectives	NA

Appendix 2: Reconciliation Table

Table 4 Reconciliation

Expenditure	DNSP	2025-26	2026-27	2027-28	2028-29	2029-30	2025-30
GRID COMMS MW Radio Edge NQ FN REPEX ($ Direct)	Ergon	$0.84M	$0.84M	$0.84M	$0.84M	$0.84M	$4.24M

Appendix 3: Asset Performance Information

[redacted]