



Application guidelines

Regulatory investment test for distribution

August 2022

© Commonwealth of Australia 2022

This work is copyright. In addition to any use permitted under the Copyright Act 1968, all material contained within this work is provided under a Creative Commons Attributions 3.0 Australia licence, with the exception of:

- the Commonwealth Coat of Arms
- the ACCC and AER logos
- any illustration, diagram, photograph or graphic over which the Australian Competition and Consumer Commission does not hold copyright, but which may be part of or contained within this publication. The details of the relevant licence conditions are available on the Creative Commons website, as is the full legal code for the CC BY 3.0 AU licence.

Requests and inquiries concerning reproduction and rights should be addressed to the Director, Corporate Communications, Australian Competition and Consumer Commission, GPO Box 3131, Canberra ACT 2601 or publishing.unit@acc.gov.au.

Inquiries about this publication should be addressed to:

Australian Energy Regulator
GPO Box 520
Melbourne Vic 3001

Tel: 1300 585165

Email: RIT@aer.gov.au
AER Reference: 63054

Amendment Record

Version	Date	Pages
1	23 August 2013	67
2	18 September 2017	67
3	14 December 2018	92
4	1 August 2022	94

Contents

Shortened forms	6
1 Nature and Authority	8
1.1. Introduction.....	8
1.2. Authority.....	8
1.3. Role of the RIT–D application guidelines	9
1.4. Definitions and interpretation.....	9
1.5. Process of revision.....	9
1.6. Version history and effective date.....	9
2 Overview of the RIT–D.....	10
2.1. Purpose of the RIT–D	10
2.2. Projects subject to a RIT–D assessment	10
2.2.1 Urgent and unforeseen investments.....	12
2.2.2 Capital cost thresholds and external contributions.....	12
3 Operation and application of the RIT–D	14
3.1. Identified need	14
3.2. Credible options.....	16
3.2.1 Addressing the identified need	16
3.2.2 Commercially and technically feasible.....	18
3.2.3 Developing credible options with option value	19
3.2.4 Number and range of credible options.....	21
3.3. Characterising the base case	21
3.4. Selecting reasonable inputs	24
3.4.1 Using integrated system plan and other external documents.....	25
3.4.2 Discount rates	26
3.4.3 Value of customer reliability.....	27

3.5. Valuing costs	29
3.5.1 Accounting for demand response payments.....	29
3.5.2 The cost of complying with laws and regulations	31
3.5.3 The treatment of land	32
3.5.4 Other financial costs.....	32
3.6. Market benefit classes.....	33
3.6.1 Material classes of market benefits	33
3.6.2 Additional classes of market benefits	35
3.7. Methodology for valuing market benefits	36
3.7.1 Deriving states of the world in each reasonable scenario	36
3.7.2 Deriving and weighting market benefits.....	38
3.7.3 Categories of market benefits.....	40
3.8. Reasonable scenarios and sensitivities	42
3.8.1 Testing sensitivities to select reasonable scenarios	42
3.8.2 Modelling and analysis required under the RIT–D	46
3.8.3 High impact, low probability events	47
3.9. Uncertainty and risk	48
3.9.1 Uncertainty regarding market benefits.....	48
3.9.2 Uncertainty regarding costs.....	50
3.9.3 Option value.....	51
3.10 Selecting the preferred option	53
3.11 Externalities.....	53
3.11.1 Externalities and external funding contributions.....	54
3.12 Suitable modelling periods	56
4 Stakeholder engagement process in applying the RIT–D.....	58
4.1. Consumer and non-network engagement	59
4.2. Options screening report	60

4.3. Draft project assessment report.....	62
4.4. Final project assessment report.....	64
4.5. Reapplication of the RIT–D	65
4.5.1 Cancellation of a RIT–D	66
5 Dispute resolution	68
5.1. Who can make a RIT–D dispute.....	68
5.2. What can be disputed.....	69
5.3. Lodging a dispute and information required.....	69
5.4. Procedure for a dispute.....	71
6 Clause 5.17.4(c) determinations	73
6.1. Screening for non-network options and SAPS options	73
6.2. Assessing non-network options as potential credible options ...	73
6.3. Publishing a clause 5.17.4(d) notice	74
A Valuing specific classes of market benefits.....	76
A.1 Voluntary load curtailment.....	76
A.2 Involuntary load shedding and customer interruptions.....	78
A.3 Costs to other parties.....	81
A.4 Timing of expenditure	82
A.5 Load transfer capacity and embedded generators.....	83
A.6 Electrical energy losses	83
A.7 Option value	84
B Glossary	91

Shortened forms

Shortened form	Full form
ACCC	Australian Competition and Consumer Commission
AEMC	Australian Energy Market Commission
AEMO	Australian Energy Market Operator
AER	Australian Energy Regulator
ALARP	as low as reasonably practicable
base case credible option	a credible option that is used as a base case, which is only permissible for RIT–Ds driven by reliability corrective action
BAU	business-as-usual
BAU base case	a standard base case where the RIT–D proponent does not implement a credible option to meet the identified need, but rather continues its BAU activities
distribution business	distribution network service provider
draft report	draft project assessment report
final report	final project assessment report
HILP event	high impact low probability event
ISP	integrated system plan
MW	megawatt
MWh	megawatt hour
NEL	National Electricity Law
NEM	National Electricity Market
NEO	National Electricity Objective
NER	National Electricity Rules
network business	a distribution or transmission network service provider
NTNDP	national transmission network development plan
Other Party	a party other than a Participant

Participant	a registered participant under the NER or any other party in their capacity as a consumer, producer or transporter of electricity in the NEM
RET	renewable energy target
RIT-D	regulatory investment test for distribution
RIT-T	regulatory investment test for transmission
SAIDI	system average interruption duration index
SAIFI	system average interruption frequency index
transmission business	transmission network service provider
VCR	value of customer reliability
VPP	virtual power plant

1 Nature and Authority

1.1 Introduction

Consistent with the requirements of clause 5.17.2(a) of the National Electricity Rules (NER), this document (the RIT–D application guidelines) sets out guidance for the operation and application of the regulatory investment test for distribution (the RIT–D).

1.2 Authority

Clause 5.17.2(a) of the NER requires the Australian Energy Regulator (AER) to develop and publish, in accordance with the distribution consultation procedures, guidelines for the operation and application of the RIT–D.

The RIT–D application guidelines must:

- Give effect and be consistent with the relevant provisions of the NER.¹
- Provide guidance on:
 - the operation and application of the RIT–D;
 - the process to be followed in applying the RIT–D;
 - what will be considered to be a material and adverse National Electricity Market (NEM) impact for the purpose of defining interested parties; and
 - how we will address and resolve disputes raised on the RIT–D and its application²; and
- Provide guidance and worked examples as to:
 - how to make a determination when a RIT–D proponent is not required to prepare and publish an options screening report³;
 - what constitutes a credible option;
 - the suitable modelling periods and approaches to scenario development;
 - the classes of market benefits to be considered;
 - the acceptable methodologies for valuing the market benefits of a credible option;
 - acceptable methodologies for valuing the costs of a credible option;
 - the appropriate approach to undertaking a sensitivity analysis;
 - the appropriate approaches to assessing uncertainty and risks; and
 - what may constitute an externality under the RIT–D.⁴

¹ NER, cl. 5.15.2; 5.17.2–5.

² NER, cl. 5.17.2(b)(2).

³ NER, cl. 5.17.2(c); 5.17.4(c).

⁴ NER, cl. 5.17.2(c).

1.3 Role of the RIT–D application guidelines

RIT–D proponents must apply the RIT–D to all proposed distribution investments, except in the circumstances described in NER clause 5.17.3(a). The RIT–D application guidelines provide guidance on the operation and application of the RIT–D, the process for RIT–D proponents to follow in applying the RIT–D, and how we will address and resolve disputes regarding the RIT–D.

RIT–D proponents should read the RIT–D application guidelines in conjunction with the requirements in the RIT–D and the relevant clauses of the NER.

1.4 Definitions and interpretation

In the RIT–D application guidelines, words and phrases have the meaning given in the RIT–D or otherwise in:

- the glossary; or
- the NER.

1.5 Process of revision

We may amend or replace the RIT–D application guidelines from time to time in accordance with the distribution consultation procedures and NER clause 5.17.2.

1.6 Version history and effective date

A version number and an effective date of issue will identify every version of these RIT–D application guidelines.

Each version of these RIT–D application guidelines will be effective from its effective date of issue, and RIT–D proponents should apply it as soon as practical. However, for compliance purposes concerning a RIT–D, we will only have regard to the guidance that was in effect when a RIT–D proponent initiated the RIT–D in question. In this context, initiated means from the publication of an options screening report or an options screening notice under NER clause 5.17.4(d), whichever relevant.

2 Overview of the RIT–D

RIT–D proponents must apply the RIT–D in accordance with NER clause 5.17 to assess the economic efficiency of proposed investment options. The RIT–D aims to promote efficient investment in distribution networks in the NEM by promoting greater consistency, transparency and predictability in distribution investment decision making.

2.1 Purpose of the RIT–D

NER clause 5.17.1(b) states that the purpose of the RIT–D is to:

...identify the *credible option* that maximises the present value of the net economic benefit to all those who produce, consume and transport electricity in the *National Electricity Market* (the *preferred option*). For the avoidance of doubt, a *preferred option* may, in the relevant circumstances, have a negative net economic benefit (that is, a net economic cost) where the *identified need* is for reliability corrective action.

Fulfilling this purpose contributes to achieving the National Electricity Objective (NEO) to promote efficient investment in, and efficient operation and use of, electricity services for the long-term interests of consumers of electricity.⁵ Before investing in a large distribution project to meet a need on the distribution network, a RIT–D proponent must consider all credible options to meet that need, before selecting the option that maximises the net economic benefit across the NEM. This reduces the risks that consumers will pay for inefficient investments.

Requiring RIT–D proponents to consider all credible options promotes competitive neutrality, which promotes selecting the most efficient investment. This also encourages efficient outcomes in the longer term by supporting efficient contestable market development by promoting a predictable network development framework around which competitive investments in the NEM can be made without bearing unnecessary risks arising from inefficient investment.

The RIT–D further promotes investment efficiency by imposing transparency and accountability on major distribution investment decisions. This contributes to the NEO to the extent that other efficiency incentives under regulatory regime are imperfect, or relatedly, to the extent that the economic interests of the RIT–D proponent differ from what maximises the net economic benefit across the NEM.

2.2 Projects subject to a RIT–D assessment

NER clause 5.17.3 requires a RIT–D proponent apply the RIT–D to a RIT–D project unless the project falls under defined circumstances. NER clause 5.10.2 defines a RIT–D project as a project to address an identified need that a distribution network service provider (distribution business) has identified, or a joint planning project that is not a regulatory investment test for transmission (RIT–T) project.

⁵ NEL, Section 7.

The circumstances where a RIT–D proponent does not need to apply the RIT–D include where the:

- RIT–D project is required to address an urgent and unforeseen network issue that would otherwise put at risk the reliability of the distribution network or a significant part of that network (see section 2.2.1).
- Estimated cost to the network service providers (network businesses) affected by the RIT–D project of the most expensive potential credible option to address the identified need is less than the RIT–D cost threshold (as varied in accordance with a 'RIT–D cost threshold' determination).⁶ For an explanation of how external capital contributions relate to this RIT–D exemption, see section 2.2.2.
- Cost of addressing the identified need is to be fully recovered through charges other than charges in respect of standard control services or prescribed transmission services. For an explanation of how external capital contributions relate to this RIT–D exemption, see section 2.2.2.
- Identified need can only be addressed by expenditure on a connection asset that provides services other than standard control services or prescribed transmission services.
- RIT–D project relates to the maintenance of existing assets and is not intended to augment a network or replace network assets.
- Proposed expenditure relates to a 'protected event emergency frequency control scheme' investment and is not intended to augment a network.

In determining whether a RIT–D proponent must apply the RIT–D to a proposed project, that proponent must not treat different parts of an integrated solution to an identified need as distinct and separate options.⁷

A distribution business must apply the RIT–D to an asset replacement program if the expected capital costs of the program are above the RIT–D cost threshold and if the program is to address an identified need. For the purpose of applying this guidance, an asset replacement program to address an identified need is a proactive program to replace multiple assets of the same type as part of one plan to meet a network investment objective. For example, this might include a program to proactively replace a large number of protection relays prior to failure. This type of program might be driven by cost savings from bulk replacement and expected benefits from avoiding costs associated with an increased probability of failure. For specific information on performing economic assessments on replacement programs, see our industry practice application note on asset replacement planning (a finalised version of this note will be available before February 2019).⁸

⁶ Under NER clause 5.15.3, we must review RIT–D cost thresholds every three years. We will publish details regarding any review of the RIT–D thresholds (including any revisions to this threshold) on our website, www.aer.gov.au. This threshold was \$5 million at the time of drafting and will become \$6 million from 1 January 2019.

⁷ NER, cl. 5.17.3(e).

⁸ A draft version of the note is, and a final version will be available on our website under: <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/industry-practice-application-note-for-asset-replacement-planning>.

For completeness, asset replacement programs for the purpose of the above guidance differ from ongoing efforts to reactively replace multiple small assets, such as ongoing work to replace poles that have failed inspection or serviceability tests. We would expect that this latter type of expenditure would be captured in the revenue allowance as business-as-usual (BAU) replacement expenditure.

NER clause 5.17.3(e) requires that where a RIT–D project receives an exemption, with the exception of negotiated network services, the network business affected by the RIT–D must, acting reasonably, plan and develop the investment required to address the identified need at the lowest cost over the life of the investment.

More generally, since the principles behind the RIT–D represent good practice, we encourage network businesses to perform transparent efficiency assessments, engage effectively with their stakeholders and to procure solutions competitively wherever possible. To assist in the latter, we encourage network businesses to proactively develop relationships with non-network businesses and make useful and user-friendly data available in their annual planning reports and other relevant documents. Network businesses should use their discretion in determining the rigour they apply to their investment decisions, which should be commensurate with the magnitude and risks associated with the investment at hand.

2.2.1 Urgent and unforeseen investments

As outlined in NER clause 5.17.3(a)(1), a RIT–D proponent does not need to apply the RIT–D to a proposed RIT–D project to address an urgent and unforeseen network issue that would otherwise put at risk the reliability of the distribution network. Under NER clause 5.17.3(c), a proposed RIT–D investment is only subject to this exemption if:

- it is necessary that the assets or services to address the issue be operational within six months of the issue being identified;
- the event or circumstances causing the identified need was not reasonably foreseeable by, and was beyond the reasonable control of, the network business (or businesses) that identified the need;
- a failure to address the identified need is likely to materially adversely affect the reliability and secure operating state of the distribution network or a significant part of that network; and
- it is not a contingent project.

2.2.2 Capital cost thresholds and external contributions

A RIT–D project is exempt from a RIT–D if the estimated capital cost to the network businesses affected by the RIT–D project of the most expensive potential credible option to address the identified need is less than the RIT–D cost threshold.⁹ An external financial or

⁹ NER ccl. 5.17.3(a)(2) and 5.15.3(d)(1). The RIT–D cost threshold as at 1 August 2022 is \$6 million. See AER, *Final determination: Cost thresholds review*, November 2021, p. 5.

capital contribution would produce an exemption if it reduced the capital cost to network businesses affected by the RIT-D project to be below the RIT-D cost threshold.

In practice, this means a RIT-D is not required for a RIT-D project if an external contribution results in the project falling below the RIT-D cost threshold. In these circumstances, the external contribution means that, to the extent of that contribution, the costs of the project do not need to be recovered from electricity consumers via the regulated charges of the relevant network business or businesses.

3 Operation and application of the RIT–D

This part of the RIT–D application guidelines provides guidance on the operation and application of the RIT–D. The broad steps for applying the RIT–D are:

1. Identify a need for the investment, known as the identified need (section 3.1).
2. Identify a set of credible options to address the identified need (section 3.2).
3. Characterise the base case against which to compare credible options (section 3.3).
4. Identify reasonable inputs to include in the cost benefit analysis (section 3.4).
5. Quantify the expected costs of each credible option (section 3.5).
6. Identify what classes of market benefits to quantify (section 3.6).
7. Estimate the magnitude of expected market benefits of each credible option by:
 - (a) Deriving states of the world to compare the market benefits of credible options relative to the base case across a range of reasonable scenarios; and
 - (b) Calculating the expected market benefit over a probability weighted range of reasonable scenarios (sections 3.7, 3.8, 3.9 and appendix A).
8. Rank each credible option by its expected net economic benefit to identify the credible option with the highest expected net economic benefit as the preferred option. In the relevant circumstances, this will require quantifying the expected net economic benefit of each credible option (section 3.10).

3.1 Identified need

Chapter 10 of the NER defines an identified need as the objective a network business seeks (or network businesses seek) to achieve by investing in the network. Either a network option, a non-network option, or a SAPS option may address an identified need.

An identified need may consist of an increase in the sum of consumer and producer surplus in the NEM. Also, or alternatively, an identified need may be for reliability corrective action, as per NER 5.17.1(b). This is where:

- NER 5.10.2 defines reliability corrective action as a network business' investment in its network to meet 'the service standards linked to the technical requirements of schedule 5.1 or in applicable *regulatory instruments* or *SAPS performance and supply standards* and which may consist of *network options, non-network options, or SAPS options*'.
- Applicable regulatory instruments include all laws, regulations, orders, licences, codes, determinations and other non-NER regulatory instruments that apply to Registered Participants to the extent that they regulate or relate to network access, connection, services, service price or augmentation. The SAPS performance and supply standards are service standards that a network business publishes following consultation and must ensure that the SAPS meets the SAPS quality of supply principle. The SAPS quality of supply principle is that the quality and reliability of supply experienced by a distribution customer having a connection point with a regulated SAPS should be no worse than the

quality and reliability of supply that the distribution customer would experience if the connection point were in a part of the distribution network forming part of the interconnected national electricity system. Given this, the range of matters covered by applicable regulatory instruments and SAPS performance and supply standards is quite broad.

- The capital expenditure objectives in NER 6.5.7(a) should guide RIT–D proponents when considering what service level outcomes are required to meet the above service standards.

In all cases, it is essential that RIT–D proponents express identified needs as the achievement of an objective or end, and not simply the means to achieve the objective or end. This objective should be expressed as a proposal to electricity consumers and be clearly stated and defined in RIT–D reports¹⁰, as opposed to being implicit. Framing the identified need as a proposal to consumers should assist the RIT–D proponent in demonstrating why the benefits to consumers outweigh the costs. That is, the RIT–D proponent should articulate its investment objective to increase consumer and producer surplus in the NEM or undertake reliability corrective action as an objective to deliver a benefit or benefits to electricity consumers.

Framing an identified need as an objective more broadly, rather than a means to achieve an objective, should prevent biasing the development of credible options towards a particular solution. NER clause 5.15.2(c) prescribes that RIT–D proponents must consider all options that it could reasonably classify as credible options without bias as to energy source, technology, ownership, and whether they are network options, non-network options, or SAPS options. A description of an identified need should not mention or explain a particular method, mechanism or approach to achieve a desired outcome.

For the above reasons, it is important to frame the identified need well from the start of the RIT–D application process. On this basis, RIT–D proponents might find it valuable to engage with key stakeholders (including consumer representatives and ourselves) on framing the identified need early on, potentially even prior to formally commencing the RIT–D process.

Example 1: Framing an identified need

A RIT–D proponent is concerned about network constraints under increased load. When framing an identified need, the RIT–D proponent should consider whether it is framing the identified need as:

- An increase in producer and consumer surplus or reliability corrective action. If it is for reliability corrective action, the identified need must point to the clear service standard obligation to justify the network investment in question. Otherwise, the identified need must be driven by an increase in consumer and producer surplus.
- An objective, rather than a means to achieve an objective. In this example, an appropriate objective would be to increase the ability of the network to 'take up load'. In

¹⁰ That is, the reports the RIT–T proponent must publish under NER clause 5.17.4.

contrast, a means to achieve the objective might be 'upgrading a power line and substation to service the increased load'.

- A proposal to consumers. To assist consumers in engaging with the RIT–D, it is valuable to articulate why it is in their interest to meet the identified need. Given this, in describing an identified need, a RIT–D proponent may find it useful to explain what will or may happen if it performs BAU activities rather than taking a specific action to address the identified need. For example, increasing the network's ability to take up load better might deliver benefits to consumers by increasing the reliability of electricity supply.

3.2 Credible options

This section provides guidance on how to apply NER clause 5.15.2(a), which requires a credible option to be an option (or group of options) that:

- Addresses (or address) the identified need. That is, achieves the objective that the RIT–D proponent seeks to achieve by investing in the network;
- Is (or are) commercially and technically feasible; and
- Can be implemented in sufficient time to meet the identified need. That is, can be implemented to meet any specific timing imperatives of the RIT–D proponent's objective.

To the extent possible, RIT–D proponents should construct credible options using individual options that meet identified needs over broadly similar timeframes. This facilitates the use of similar modelling periods (see section 3.12) and increases the transparency and robustness of the analysis.

For meeting a service standard, the RIT–D proponent's choice of credible options should reflect the degree of flexibility offered by that service standard. For example, a standard might refer to maximum levels under the system average interruption duration index (SAIDI) and system average interruption frequency index (SAIFI) across the RIT–D proponent's network over a year. In this case, the proponent should consider options at various locations on its network if some credible options could be more effective in limiting the network-average SAIDI and SAIFI than restricting attention to options in a single area. Conversely, if a standard refers to, say, SAIDI or SAIFI outcomes on individual feeders, the range of potential credible options will be correspondingly narrower.

In addition to helping stakeholders interpret the elements of NER clause 5.15.2(a), this section also provides guidance on determining a reasonable number and range of credible options, and on developing credible options with option value.

3.2.1 Addressing the identified need

As discussed in section 3.1, an identified need is the objective a network business (or network businesses, in the case of joint planning) seeks (or seek) to achieve by investing in the network. An option addresses an identified need if the RIT–D proponent reasonably considers that the option would, if commissioned within a specified time, be highly likely to meet that identified need.

Since a credible option can be an option or group of options that address an identified need, a set of projects may constitute one credible option if they form one integrated solution to meet an identified need.

Example 2 provides guidance on two different types of identified needs, along with credible options to meet each of those identified needs.

Example 2: Identified need and credible options

Identified need driven by service standards

Changing patterns of generation investment have increased the likelihood of breaching voltage service standards in the next few years.

The identified need in this example is to ensure that voltage standards as outlined in Schedule 5.3 of the NER continue to be satisfied, which is expected to improve power quality for electricity consumers. An example of a credible option to address this identified need is the installation of one or more voltage control network elements, such as a static volt-ampere reactive compensator.

Identified need driven by market benefits

A remote area receives supply from a limited sized link with the rest of the shared network, distributed generation (rooftop photovoltaics) and costly peaking generators (diesel). The RIT-D proponent identifies that it is likely to be net beneficial to reduce the area's reliance on local peaking generation through introducing a demand management program.

The identified need in this example is an (expected) increase in net economic benefits compared to the base case, which is expected to benefit electricity consumers through lower electricity costs. In formulating credible options to meet this identified need, we would expect the RIT-D proponent to reference the driver (or drivers) of the net economic benefits expected to flow from the credible option. For example, a program that delivers a defined kVA of demand management capability by incentivising owners of rooftop photovoltaics to purchase batteries and technology that optimises when they use and recharge their batteries could be justified on the basis of lower generation costs compared to the base case. Alternatively, if the credible option was compared against a network option that facilitated new sources of generation, the demand management program could be justified on the basis of avoided network capital expenditure.

Identified need driven by safety

Routine inspections of a substation have revealed that twelve transformer bushings installed in the 1960s and 1970s are now in poor condition. If the identified bushings remain in service, there is an increased likelihood that a number of these assets will fail in future years, which could result in projectiles, fires and oil spills that present an intolerable risk to those in the immediate vicinity, and potentially the wider area.

This situation might lead to an identified need that is driven by an increase in consumer and producer surplus if there is a NEM-wide economic justification for addressing that safety risk.

For instance, credible options that prevent the safety risk from materialising may avoid involuntary load shedding and reduce operating and maintenance costs incurred by other parties.

Where an applicable jurisdictional Electricity Safety Act requires that safety risks be managed in accordance with the 'As Low As Reasonably Practicable' (ALARP) principle, this requirement might justify valuing safety risks using a 'gross disproportionate factor'. For example, a gross disproportionate factor might include valuing death at three, six or 10 times the value of statistical life. The RIT–D proponent must justify its use of any gross disproportionate factor and reference the compliance requirement driving its use of that factor.

3.2.2 Commercially and technically feasible

An option is commercially feasible under NER clause 5.15.2(a)(2) if a reasonable and objective operator, acting rationally in accordance with the requirements of the RIT–D, would be prepared to develop or provide the option in isolation of any substitute options.

NER clause 5.15.2(d) prevents a RIT–D proponent from rejecting an option that would otherwise satisfy the RIT–D on the basis that it lacks a proponent. Such an option would be commercially feasible because, if undertaken, it would satisfy the RIT–D and therefore provide the investor with a reasonable expected return. This requirement prevents a RIT–D proponent from 'gaming' the RIT–D by only agreeing to act as a proponent for a network option that is over-engineered, more expensive and less net beneficial than other network options. Example 3 below provides an example of this.

An option is technically feasible if there is a high likelihood that it will, if developed, provide the services that the RIT–D proponent has claimed it could provide for the purposes of the RIT–D assessment. In providing these services, the option should also comply with relevant laws, regulations and administrative requirements. Technical feasibility will always turn on the relevant facts and circumstances, although example 3 provides a brief stylised example.

Example 3: Feasibility of options

Commercial feasibility

The most likely option in a particular area for enhancing the sum of consumer and producer surplus is to augment an existing distribution line between substation A and substation B that runs through a major load centre.

However, the RIT–D proponent refuses to act as a proponent for this option and thereby claims that the option is not a credible option for enhancing net economic benefits. Instead, the RIT–D proponent proposes a costlier option involving augmenting a line from substation A to substation C. This is where substation C is further away and has less in-built redundancy and, in turn, requires an upgrade as part of the credible option.

In this case, the cheaper augmentation must be considered a credible option, because a reasonable and objective RIT–D proponent would be willing (in isolation of any other

substitute projects it might have in mind) to construct it if it passed the RIT–D.

Technical feasibility

A proponent has suggested a local geothermal generation option as an alternative to the network option above. According to the proponent, the local geothermal option would provide the same services as the RIT–D proponent's proposed network option.

However, the RIT–D proponent reasonably believes that the geothermal option will not presently be feasible due to the relatively untested nature of the technology in Australia. In this case, it need not consider the geothermal plant a credible option due to a lack of technical feasibility.

3.2.3 Developing credible options with option value

A RIT–D proponent may find value in retaining flexibility to respond to changing market developments or scenarios as they emerge where there is material uncertainty and the option/s that it is considering involve a sunk or irreversible action. One approach is to consider credible options formed by a group of options that include:

- an initial option that allows the RIT–D proponent to defer expenditure of a more costly option until more information becomes available; and
- a subsequent option that would only be implemented under certain future conditions or states of the world.

When a RIT–D proponent accounts for this value, as example 4 shows, it is effectively incorporating option value into its RIT–D assessment.

Example 4: Identifying credible options when there is uncertainty

A RIT–D proponent is considering augmenting a section of its distribution network. The RIT–D proponent has forecast future demand and found a material degree of uncertainty. A major property developer is exploring whether to build a large residential estate in the area. Consequently, the RIT–D proponent has forecast the following future scenarios:

- Low demand: demand decreases by 1 per cent over the next 6 years with 50 per cent probability.
- High demand: demand increases by 20 per cent over the next 6 years with 50 per cent probability.

In light of the high demand scenario, the RIT–D proponent is considering a network augmentation option by investing in a large substation and additional poles and wires. This investment would be costly and only beneficial in the forecast high demand scenario. There is a 50 per cent chance that this scenario would not eventuate.

However, it may be prudent for the RIT–D proponent to retain the flexibility to respond to the high demand scenario if and as it emerges. This could enable the RIT–D proponent to delay

the large substation investment until there is certainty or a higher likelihood that the major property development will go ahead.

If the identified need is such that it is sub-optimal for the RIT–D proponent to do nothing while it waits for information, it could be prudent for it to make a smaller or more reversible investment in the interim. This could entail implementing a direct load control project, or giving electricity consumers incentive payments to reduce their electricity consumption at periods of peak demand.

In this example, the RIT–D proponent identifies the following credible options:

- Augment the network in year 2.
- Implement a voluntary load curtailment program in year 1 and wait for more information before deciding whether to augment its network. Subject to the information, which the RIT–D proponent expects to receive in year 3, the RIT–D proponent could augment the network in year 4.

After the RIT–D proponent quantifies the market benefits in both reasonable scenarios, it might find that the market benefits are highest in the second option.

In the above example, the RIT–D proponent is effectively considering a credible option that includes a decision rule or policy specifying, not just an action or decision to take now, but also an action or decision to take in the future if the appropriate market conditions arise. As another example, where future demand growth is uncertain, the following may all be legitimate credible options:

- Option (a): fully upgrade a distribution line in the immediate term to accommodate all likely demand growth over the next 15–20 years.
- Option (b): upgrade a distribution line to cover likely demand growth in the next five years (without any further consideration of the potential for further growth in the future) coupled with a generic non-network option if necessary following a decision based on the same 'decision rule' as for Option (c) (see below). While this option should be lower cost than Option (a) in most, if not all scenarios, it should also have lower market benefits than Option (a), particularly after year five under higher demand scenarios.
- Option (c): upgrade a distribution line as per Option (b), but also allow extra space for a relatively low-cost expansion of the network following a decision based on a 'decision rule' (for example, if peak demand reaches a specified level). The extra space provided under this option would likely incur an additional up-front cost relative to Option (b). To capture the higher market benefits of this option relative to Option (b), the RIT–D proponent would need to include a scenario where peak demand reaches the specified level, and then model the costs and benefits of the second stage expansion versus the costs and benefits of the non-network supplementary project that would be triggered under Option (b).

For clarity, when a decision rule leads to a new stage of the RIT–D project ('stage two'), the RIT–D proponent should:

- Transparently update stakeholders on how it applied its decision rule to commence stage two, such as by providing an addendum to its final project assessment report (final report).
- Apply a new RIT–D before commencing the stage two of the RIT–D project if:
 - The stage two investment passes the RIT–D cost threshold; and
 - There has been a material change in circumstances beyond the contingencies explored in the decision rule. As an example, while the decision rule under Option (c) above was based on peak demand reaching a specified level, there may have been a material change in input costs that was not consistent with stage two of the preferred option identified. Another material change in circumstances could be the formerly-unforeseen availability of an alternative credible option, such as demand response provided by a virtual power plant program.

The ability of a RIT–D proponent to formulate credible options incorporating a decision rule or policy assists the RIT–D cost benefit analysis to include option value as a potential source of market benefit. Section 3.9 discusses this further by providing guidance on identifying credible options where there is a material degree of uncertainty.

3.2.4 Number and range of credible options

NER clause 5.15.2(c) states that in applying the RIT–D, the RIT–D proponent must consider all options that it could reasonably classify as credible options, without bias to energy source, technology, ownership and whether it is a network option, non-network option, or SAPS option.

The number of credible options a RIT–D proponent assesses for meeting a particular identified need should be proportionate to the magnitude of the likely costs of any credible option. Therefore, if the RIT–D proponent reasonably estimates that the costs attributable to any one of several credible options orientated towards meeting an identified need at particular town is \$50 million, the RIT–D proponent should consider a larger number and range of credible options than if the estimated cost of most credible options was \$10 million, all other things being equal.

3.3 Characterising the base case

If the identified need is for reliability corrective action, the RIT–D proponent may choose to select a credible option as its base case (a 'base case credible option'). Otherwise, the base case is where the RIT–D proponent does not implement a credible option to meet the identified need, but rather continues its 'BAU activities' (a BAU base case). It is worth noting that even when it is open to the RIT–D proponent to select a base case credible option, the proponent might find it clearer to present its analysis by selecting a BAU base case, particularly when it is exploring asset replacement rather than augmentation projects.

'BAU activities' are ongoing, economically prudent activities that occur in absence of a credible option being implemented. For RIT–D projects concerning asset retirement, replacement or de-rating decisions, the following costs are associated with BAU activities:

- Operational, maintenance and minor capital expenditure (below the RIT–D cost threshold) required to allow the ageing or poor condition element to remain in service as effectively as possible for as long as possible.
- Credible BAU expenditure relating to the deteriorating asset to manage safety risk, environmental risk and equipment protection to the extent this expenditure meets legal obligations or is consistent with efficient industry practice. The RIT–D proponent should also consider any quantified 'risk costs' consistent with its BAU risk mitigation and management activities and with reference to our 'industry practice application note for asset replacement planning' once it has been finalised.¹¹

Generally¹², the trigger point for the timing of a credible option for a replacement RIT–D project would be when the present value of the monetised service costs exceed the present value of the replacement project costs.

Example 5 illustrates characterisation of the BAU base case where the identified need for a credible option is to increase the sum of consumer and producer surplus in the NEM.

Example 5: Characterising the base case for market benefit driven projects

Augmentation project to provide a net economic benefit

A RIT–D proponent is considering a network augmentation to avoid an increase in the expected volume of unserved energy as load at a particular location on its network grows.

No mandatory service standard or regulatory instrument is driving the augmentation to avoid expected load shedding. Therefore, the identified need must be driven by an increase in the sum of consumer and producer surplus in the NEM. Accordingly, the base case for the RIT–D assessment must refer to a state of the world in which the RIT–D proponent does not pursue the augmentation project nor implement any other credible option to meet the identified need (the BAU base case).

While this BAU base case option in the face of ongoing load growth may eventually result in what appears to be unrealistically high volumes of expected unserved energy, what is important from the perspective of a RIT–D assessment is that the base case provides a clear reference point for comparing the performance of different credible options.

The RIT–D assessment would then involve a comparison of the net economic benefit available from:

- the augmentation option as against the BAU base case; to
- other relevant credible options as against the BAU base case.

The preferred option is the option that maximises the net economic benefit across the NEM.

¹¹ A draft version of the note is, and a final version will be available before February 2019 on our website under: <https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/industry-practice-application-note-for-asset-replacement-planning>.

¹² There may be exceptions, such as when an identified need is for reliability corrective action.

If no credible option yields a net economic benefit, this means the BAU base case represents the best course of action.

Replacement project to provide a net economic benefit

A RIT–D proponent expects the condition of a network element to result in increasing volumes of expected unserved energy over time as the network element becomes increasingly prone to failure.

No mandatory service standard or regulatory instrument requires the RIT–D proponent to avoid an expected increase in load shedding. Therefore, the identified need must be driven by an increase in the sum of consumer and producer surplus in the NEM. Accordingly, the base case for the RIT–D assessment should refer to a state of the world where the RIT–D proponent does not replace the poor condition element, nor implement any other relevant credible option. In this base case, the RIT–D proponent will still incur BAU operating, maintenance and minor capital (below the RIT–D cost threshold) expenditure to allow the network element to remain in service effectively for as long as possible (a BAU base case).

While this BAU base case option may eventually result in a complete and irreparable failure of the poor condition element and very high volumes of expected underserved energy, what is important from the perspective of a RIT–D assessment is that the base case provides a clear reference point for comparing the performance of different credible options.

The RIT–D assessment will then involve a comparison of the net economic benefit available from:

- replacing the poor condition network element as against the BAU base case; to
- other relevant credible options as against the BAU base case.

The preferred option is the option that maximises the net economic benefit across the NEM. If no credible option yields a net economic benefit, it means the BAU base case represents the best course of action.

Example 6 illustrates how to characterise the base case where the identified need for a credible option is to meet any of the service standards linked to the technical requirements of schedule 5.1 or in applicable regulatory instruments or SAPS performance and supply standards—that is, reliability corrective action.

Example 6: Characterising the base case for meeting a service standard

Augmentation project to meet a service standard obligation

A RIT–D proponent is considering a network augmentation to meet service standards contained in an applicable jurisdictional regulatory instrument as load grows. That is, reliability corrective action is driving this RIT–D.¹³ The standard obliges the RIT–D proponent to meet individual feeder standards in the form of maximum levels of SAIDI and SAIFI.

¹³ NER 5.10.2 defines reliability corrective action as a network business' investment in its network to meet 'the service

As the identified need is to meet service standard obligations, the preferred option may have a negative net economic benefit, as long as it maximises the net economic benefit (or equivalently, minimises net economic detriment) while also meeting the standard. Since this is an RIT–D project where the identified need is for reliability corrective action, the base case may be a state of the world where the RIT–D proponent implements a credible option that meets the service standard obligation (that is, a 'base case credible option'). However, in other cases, the RIT–D proponent must adopt a BAU base case.

The RIT–D proponent must consider credible options that take advantage of whatever flexibility the service standard obligation offers to maximise the net economic benefit or minimise the net economic cost of meeting the standard in question. This could mean considering options that: relate to different locations on the network, reduce SAIDI more than SAIFI (or vice versa), or implement a given option at different points in time.

Replacement project to meet a service standard obligation

A RIT–D proponent is considering replacing a poor condition network element so it can continue to meet service standards contained in a jurisdictional regulatory instrument. The instrument may oblige the RIT–D proponent to meet a reliability standard (for example, individual feeder standards in the form of maximum levels of SAIDI and SAIFI) or some other service standard that is set out in NER schedule 5.1 or in an applicable regulatory instrument as defined in NER chapter 10. It is worth noting that the range of matters covered by 'applicable regulatory instruments' is potentially broad as these include all laws, regulations, orders, licences, codes, determinations and other non-NER regulatory instruments that apply to Registered Participants¹⁴ to the extent that they regulate or relate to network access, connection, services, service price or augmentation.

Replacing the element will help the RIT–D proponent avoid breaching limits relating to the service standard obligation as the poor condition network element becomes increasingly prone to failure.

As above, since the identified need is driven by reliability corrective action, the preferred option may have a negative net economic benefit. While it is open to the RIT–D proponent to select a 'base case credible option', it will be clearer for the RIT–D proponent to select a BAU base case since it is exploring asset replacement.

3.4 Selecting reasonable inputs

As a principle, wherever possible, RIT–D proponents should use:

- Inputs based on market data where this is available and applicable.
- Assumptions and forecasts that are transparent and from a reputable and independent source. In particular:

standards linked to the technical requirements of schedule 5.1 or in applicable *regulatory instruments* or SAPS performance and supply standards and which may consist of *network options, non-network options, or SAPS options*.

¹⁴ 'Registered participant' is defined in NER chapter 10.

- Material that the Australian Energy Market Operator (AEMO) publishes in developing the National Transmission Network Development Plan (NTNDP), Integrated System Plan (ISP), or similar documents should be a starting point for developing assumptions to use in a RIT–D analysis.
- Material that AEMO publishes in any up-to-date ISP or equivalent document, where that document has been adopted in the NER and/or National Electricity Law (NEL), should be used as a default for assumptions to use in a RIT–D analysis.
- Up-to-date and relevant information. For instance, it might be appropriate to depart from information that AEMO has published where there is evidence and good reason to demonstrate that alternative sources of information are more up-to-date or more appropriate to the particular circumstances under consideration.

3.4.1 Using integrated system plan and other external documents

To the extent they are relevant to the RIT–D, RIT–D proponents should consider external documents when developing assumptions and inputs to use in a RIT–D analysis. These documents would typically include the most up-to-date material published by AEMO in developing the NTNDP, ISP, or similar documents. It may be more appropriate to use alternative sources of information where there is evidence and good reason to demonstrate that this information is more up-to-date or is more appropriate to the particular circumstances under consideration.

In applying this guidance, RIT–D proponents should note that AEMO integrated its 2017 NTNDP into its 2018 ISP. Also, future changes to the NER and/or NEL are likely to integrate the previous NTNDP content into the ISP. Material that AEMO publishes in any up-to-date ISP or equivalent document referenced in the NER and/or NEL should be used as a default for assumptions to use in a RIT–D analysis. For clarity, it would be reasonable to only depart from default assumptions in limited cases, such as if there has been a material change in circumstances such that data in the most up-to-date ISP has been superseded or changed.

Example 7 illustrates how a RIT–D proponent might have regard to the information in an ISP when considering how to apply its cost benefit analysis to RIT–D projects.

Example 7: Having regard to the ISP in applying a RIT–D

A RIT–D proponent observes an increasing risk of lost load in its network due to the poor condition of a network element. There is an identified need to manage this electricity supply risk, and thereby deliver market benefits from reducing expected load curtailment.

AEMO recently published an ISP that forecasts a lowest present value resource cost path for generation and network infrastructure development that will meet reliability and renewable energy targets. This path includes expanding the capacity of an existing transmission line that runs through the RIT–D proponent's network (project T). The RIT–D proponent was not planning to account for project T prior to the publication of the ISP, as the main driver for project T will be to connect a renewable energy zone that was yet to be explored commercially.

In the RIT–D proponent's view, unless a high load growth scenario is realised, this transmission upgrade will defer the identified need by several years. Moreover, the transmission upgrade will increase the net economic benefits of the smaller credible options under the RIT–D relative to the larger credible options.

In this example, the RIT–D proponent should:

- Undertake joint planning with the transmission business that would be responsible for project T.
- Include at least one reasonable scenario where project T becomes committed consistent with the recommended timing in the ISP, and at least one reasonable scenario where project T does not become committed (unless it is already a 'committed' or 'anticipated project'). The RIT–D proponent should work closely with this transmission business in estimating the weighting to apply to the reasonable scenario (or scenarios) where project T becomes committed. For completeness, if other projects in AEMO's network development path are also expected to have a material effect on the analysis, the reasonable scenarios described above should include the preferred network development path more broadly (or at least the relevant projects within it), rather than just project T.
- Carefully explore staging options, as well as how the RIT–D project's commissioning date might affect its expected net economic benefits. For example, if the net economic benefits are higher when commissioning the RIT–D project earlier than project T, the RIT–D proponent might explore undertaking a smaller solution in the short term (such as network support), with the option to expand that solution (such as by augmenting network capacity) when more information is known about project T.

3.4.2 Discount rates

NER clause 5.17.1(c)(9)(iii) requires that the RIT–D specify the method for determining the discount rate or rates to apply. Paragraphs 16–17 of the RIT–D state:

16. The present value calculations must use a commercial discount rate appropriate for the analysis of a private enterprise investment in the electricity sector. The discount rate used must be consistent with the cash flows that the RIT–D proponent is discounting.

17. The lower boundary should be the regulated cost of capital.

Paragraph 16 of the RIT–D provides RIT–D proponents with the flexibility to adjust the discount rate to reflect the risks that different types of projects carry. We expect these adjustments would vary between identified needs rather than between credible options to address a specific identified need. It will typically be best practice to capture the relative riskiness of different credible options through scenario analysis rather than by using different discount rates (see section 3.8 on scenario analysis).

Considering the above, as a default, a RIT–D proponent should use the same discount rate for different credible options to address a given identified need. If a RIT–D proponent has a

sound reason to depart from this default by using a different discount rate for a particular credible option, it must:

- Clearly and transparently provide this reasoning, including providing supporting evidence; and
- Show if or how this decision affects the ranking of credible options.

Since the discount rate is a particularly important parameter for estimating the present value of long term projects, we expect RIT–D proponents to explore:

- Whether as part of its scenario analysis, there is reason to include reasonable scenarios with different discount rates. If it includes a scenario with a lower than expected discount rate, it would also be reasonable to explore a scenario with a higher than expected discount rate. As required in paragraph 17 of the RIT–D, the regulated cost of capital should be the lower bound.
- When sensitivity testing the outcome of its cost benefit analysis, if applicable, illustrate 'boundary values' for discount rates at which the preferred option changes. The RIT–D proponent can then discuss the plausibility of those values and analyse this risk.

3.4.3 Value of customer reliability

The value of customer reliability (VCR), typically reported in dollars per kWh, is an important parameter for estimating classes of market benefits that relate to reliability, such as changes in voluntary and involuntary load curtailment. When considering what VCR to apply, a RIT–D proponent should:

- Consider whether the selected VCR is representative of the reliability preferences of the range of customers that the credible options in question will affect.
- Have regard to the factors that cause the VCR to vary. These include outage length, width of affected area, and customer type.
- Use estimates that are up-to-date, fit for purpose and based on a transparent methodology. This is where a transparent methodology should provide sufficient detail for interested stakeholders to follow what has been done. An independent expert should make these estimates publicly available. As an example:
 - The VCRs that AEMO derived from 2013–14 NEM-wide VCR study should meet a number of these criteria.¹⁵ To the extent that a RIT–D proponent is considering options to address potential network outages that cannot be reasonably derived using the AEMO VCR results, this may require adjustments to the VCR values or the use of an alternative VCRs which are more fit for purpose. If a RIT–D proponent proposes to do this, it should be transparent about the methodology used to derive the VCR and consult with stakeholders.

¹⁵ <https://www.aemo.com.au/Electricity/National-Electricity-Market-NEM/Planning-and-forecasting/Value-of-Customer-Reliability-review>.

- The VCR estimates we will publish and update annually from 31 December 2019. This follows a rule change in July 2018 that gave us the responsibility of determining VCR estimates in the NEM and Northern Territory. We are an independent, expert source. We will derive VCR estimates and a mechanism for annual updating using a transparent methodology on which we have publicly consulted and will review at least once every five years. In developing the methodology and deriving VCR estimates, we will have regard to the current and potential uses of VCRs.

RIT–D proponents should use VCR calculations based on an accepted estimate, such as those produced by AEMO, or by us from 31 December 2019. When estimating VCRs, we must take into account the VCR objective, which requires that the VCR methodology and values be fit for purpose for any current or potential uses of VCR that we consider relevant.¹⁶ We consider that the application of the VCR to network planning, and in particular the RIT–D, is one of the core applications of the VCR and we will develop published VCR values that are fit for this purpose. Therefore any deviation from or adjustment of our published VCR values (for example, to reflect a specific mix of customers or HILP event that is already captured in our VCR estimates) must be clearly justified, setting out why it would not be appropriate to apply, or why it would be appropriate to make adjustments to, our published values. In coming to a decision to apply separate VCRs, RIT–D proponents should consult directly with both us and the customers to whom the VCR applies.

We note that the primary issues involved with VCRs, which accepted VCR estimates should already take into account (although may warrant some adjustments if there is clear supporting evidence), are:

- Consideration of customer types in the supply area under consideration — that is, different customer types place different values on reliability and on different aspects of reliability. For example, residential VCRs would reflect the general inconvenience attached to an outage. In contrast, for industrial customers, the VCR reflects lost sales and productivity, as well as stand down, shut down and start-up costs.
- VCRs should reflect the weighted mix of customers that the option affects. Weighting based on actual or projected customer types and on the reliability value of those customer types should be used in economic analysis.
- A customer’s VCR for a particular outage may be influenced by factors such as outage duration and outage frequency, and some customers may be more influenced by momentary outages than others. The VCR should reflect the reliability preferences of the affected customers, and the nature and type of reliability issue it is modelling.

Since, like the discount rate, the VCR is an important metric, we expect a RIT–D proponent to explore:

- Whether as part of its scenario analysis, there is reason to include reasonable scenarios with different VCRs. If it includes a scenario with a higher than expected VCR, it would also be reasonable to explore a scenario with a lower than expected VCR. The expected

¹⁶ NER cl. 8.12(a).

VCR should have a basis in an independent estimate (such as values that AEMO uses, or that we will provide from 31 December 2019).

- When sensitivity testing the outcome of its cost benefit analysis, if applicable, illustrate 'boundary values' for VCRs at which the preferred option changes. The RIT–D proponent can then discuss the plausibility of those values and analyse this risk.

For a more general discussion on scenario analysis and sensitivity analysis, see section 3.8.

3.5 Valuing costs

Under NER clause 5.17.1(c)(6), the RIT–D proponent must consider whether the following classes of costs would be associated with each credible option:

- financial costs incurred in constructing or providing the credible option;
- operating and maintenance costs over the operating life of the credible option;
- cost of complying with laws, regulations and applicable administrative requirements in relation to the credible option (see section 3.5.2);
- costs unique to asset replacement projects or programs; and
- any other financial costs we determine to be relevant.

A RIT–D proponent must capture these classes of costs in its RIT–D assessment.

Where the identified need is for reliability corrective action, costs refer to the incremental or relative costs of another credible option over (or under) the costs of the base case. RIT–D proponents must not subtract actual option costs from relative market benefits.

For asset replacement projects or programs, there are costs unique to asset replacement resulting from the removal and disposal of existing assets, and a RIT–D assessment must recognise these costs. RIT–D proponents should include these costs in the costs of all credible options that require removing and disposing of retired assets. For completeness, the RIT–D proponent would exclude these costs from the 'BAU' base case, which section 3.3 defines.

3.5.1 Accounting for demand response payments

In the case of demand side options, rewards or inducements paid to consumers for voluntary load curtailment may be counted as either a:

- i. cost of the demand side option (implicitly included in the full contract cost paid by the RIT–D proponent to the non-network business); or
- ii. negative market benefit of the demand side option (while the commission or fees paid by the RIT–D proponent to the demand side aggregator or relevant energy service business count as a cost of the demand side option).

The less consumers require payment to curtail their power use, the lower the negative market benefits from a voluntary curtailment option. This is because, in a competitive

market, the payment consumers need to curtail their power should reflect, at a minimum, the real loss of utility they experience from not consuming power.

As set out in example 8 below, the two options for the treatment of demand side payments are intended to be equivalent, although the second option may yield a more accurate result where payments to consumers vary by reasonable scenario.

Example 8: Treatment of demand-side response payments

A RIT–D proponent expects load on a particular network to reach 201 MW, but the network’s capacity is only 200 MW. Consumers value involuntarily curtailed load at \$45,000/MWh. A demand side credible option involves paying a demand aggregator:

- \$500,000 per year as an availability payment, which the aggregator will pass on in full to a group of large electricity consumers; and
- \$1,500/MWh to curtail load by 1 MW during 100 pre-notified hours of critical peak periods each year. Of this, the aggregator will retain \$500/MWh and pay the remaining \$1,000/MWh to the group of large electricity consumers to curtail their load during these periods.

In the base case:

- Demand exceeds supply by 1 MW for 100 hours a year.
- The value of voluntary load curtailment is \$0.
- The value of involuntary load curtailment is 1 MW x 100 hours x \$45,000/MWh = \$4.5 million per year.

Under the demand side credible option, demand is curtailed by 1 MW for 100 hours a year so system load does not exceed system supply. As such, the demand side option avoids involuntary load shedding, in contrast to the base case. Table 1 shows the apportioning of costs and market benefits under the two options.

Benefits less costs are the same in both treatments. The two options are equivalent.

Table 1: Modelling and analysis required (reliability corrective action project)

Credible option		Option (i)	Option (ii)
Costs	Payment to the demand aggregator	Full load curtailment payment + availability payment: 1 500/MWh x 1 MW x 100 hours + \$500 000 = \$650 000 per year	Only the part of the load curtailment payment retained by the aggregator: \$500/MWh x 1 MW x 100 hours = \$50 000
	Total Cost	\$650 000	\$50 000

Market Benefits	Negative value of voluntary load curtailment (as reflected in payments to consumers)	\$0	Load curtailment payment + availability payment: -\$1 000/MWh x 1 MW x 100 hours - \$500,000 = -\$600 000
	Value of avoided involuntary load curtailment	\$4 500 000	\$4 500 000
	Total Market Benefit	\$4 500 000	\$3 900 000
	Benefits less costs	\$4 500 000 - \$650 000 = \$3 850 000 per year	\$3 900 000 - \$50 000 = \$3 850 000 per year

3.5.2 The cost of complying with laws and regulations

In some cases, a RIT–D proponent may have a choice as to how it complies with a law, regulation or administrative requirement. For example, the RIT–D proponent may lawfully choose to pay a financial amount rather than undertake some other action (which is otherwise necessary to comply with the relevant law, regulation or administrative requirement). If the financial amount is smaller than the costs of undertaking some other action, the RIT–D proponent may treat the financial amount as part of that credible option's costs.

A RIT–D proponent must exclude from its analysis, the costs (or negative benefits) of a credible option's harm to the environment or to any party that is not expressly prohibited or penalised under the relevant laws, regulations or administrative requirements. This places the onus on policy makers to prohibit certain activities or to value various types of harm and impose financial penalties accordingly. The RIT–D has no role in prohibiting or penalising activities that policy does not prohibit or penalise.

A RIT–D proponent may expect a credible option would change whether another party in the NEM pays penalties or incurs costs in connection with meeting a government policy connected to their role as a producer, consumer or transporter of electricity in the NEM (such as a renewable energy target, National Energy Guarantee or similar scheme). In such cases, the RIT–D will capture these changes in costs to other parties in that credible option's market benefits, rather than its costs.

Example 9 demonstrates costs of a credible option on externalities.

Example 9: Cost of a credible option

Unpriced externality

To meet an identified need, a RIT–D proponent identifies the development of a local gas-fired embedded generator in close proximity to an existing hotel as a credible option. The present value of the embedded generator's expected construction and operating costs is \$90 million. The RIT–D proponent expects the generator to reduce the hotel's earnings due to a

loss of visual amenity. The present value of this loss is \$5 million. There are no planning standards, consents or other requirements to protect the hotel against this loss.

In the absence of any planning standards, consents or other requirements hindering its development, the costs of the credible option remain \$90 million. The negative externality created by the embedded generator's development and borne by the hotel is not regulated or legislated by any relevant law, regulation or administrative requirement and therefore does not form part of the costs of the credible option.

Penalised externality

Continuing from above, assume that a regulatory body allows the development of the credible option contingent on the RIT–D proponent paying for landscaping to conceal the embedded generator and to reduce the harm to the visual amenity of the hotel's guests. The present value of this landscaping is \$5 million.

In this case, the costs of the credible option would be $90 + 5 = \$95$ million. The \$5 million is now included as part of the costs of the credible option since a relevant regulatory body requires the generator's development was contingent on such an expense being incurred.

3.5.3 The treatment of land

Given that the cost of land may be a cost incurred in constructing or providing a credible option¹⁷, the value of land should be included as part of a RIT–D assessment. The purpose of the RIT–D is to identify the credible option that maximises the present value of the net economic benefit to all those who produce, consume and transport electricity in the NEM. Therefore, the RIT–D proponent should assess all credible options at present values. The RIT–D proponent should therefore use the market value of land in assessing the costs incurred in constructing or providing credible options.

For clarity, strategic land purchases (that is, acquiring an easement in advance of making an investment decision to build on that land) need not trigger a RIT–D. However, the market value of land should be included in a RIT–D that explores building on a previously acquired easement (that is, land should not be treated as a sunk cost, to the extent that it can otherwise be sold).

3.5.4 Other financial costs

A RIT–D proponent may propose any other financial cost that it considers relevant. If a RIT–D proponent includes other financial costs in its RIT–D assessment, it should provide us with a written explanation outlining the relevance of the financial cost, including any underlying assumptions.

¹⁷ NER, cl. 5.17.1(c)(6)(i).

The RIT–D proponent must submit this proposal to us before making its options screening report available to other parties. If the RIT–D proponent is not preparing an options screening report, we must approve the proposal before the RIT–D proponent publishes a notice of its determination that there are no credible non-network options or credible SAPS options.

If we agree that the RIT–D proponent should account for the proposed class and magnitude of financial cost, we will provide approval in writing as soon as practical.

3.6 Market benefit classes

NER clause 5.17.1(c)(4) requires RIT–D proponents to consider whether each credible option could deliver the following classes of market benefits:

- changes in voluntary load curtailment;
- changes in involuntary load shedding and customer interruptions caused by network outages, using a reasonable forecast of the value of electricity to customers;
- changes in costs for parties, other than the RIT–D proponent, due to differences in: the timing of new plant, capital costs, and operating and maintenance costs;
- differences in the timing of expenditure;
- changes in load transfer capacity and the capacity of embedded generators to take up load;
- any additional option value (where this value has not already been included in the other classes of market benefits) gained or foregone from implementing the credible option with respect to the likely future investment needs of the NEM;
- changes in electrical energy losses; and
- any other class of market benefit that we determine to be relevant.

On 'any other class of market benefit that we determine to be relevant', paragraph 7.h. of the RIT–D specifies that:

...The AER will consider a class of market benefit relevant if the RIT–D proponent has determined it to be relevant to a required class of market benefit and we have agreed to it in writing before the RIT–D proponent makes its options screening report available to other parties. If the RIT–D proponent is not preparing a options screening report, we must make this agreement before the RIT–D proponent publishes the notice under cl. 5.17.4(d) of the NER.

For the purposes of paragraph 7.h. of the RIT–D, we will accept the following classes of market benefits as relevant if the RIT–D proponent requests our approval to include them in its RIT–D, consistent with section 3.6.2:

- changes in fuel consumption arising through different patterns of generation dispatch;
- changes in ancillary services costs; and
- competition benefits.

3.6.1 Material classes of market benefits

We require a RIT–D proponent to include all classes of market benefits in its analysis that it considers material. A RIT–D proponent must consider whether each credible option could deliver the classes of market benefits specified under NER clause 5.17.1(c)(4). NER clause 5.17.1(d) specifies that:

A RIT–D proponent may, under the regulatory investment test for distribution, quantify each class of market benefits under paragraph (c)(4) where the RIT–D proponent considers that:

- (1) any applicable market benefits may be material; or
- (2) the quantification of market benefits may alter the selection of the preferred option

While a RIT–D proponent must consider each class of market benefit specified under NER clause 5.17.1(c)(4), it is not obligated to quantify the benefits that it considers to be immaterial or will not alter the selection of the preferred option. Likewise, a RIT–D proponent is not obligated to quantify market benefits for reliability driven projects.¹⁸

However, where an identified need is not for reliability corrective action, including more classes of market benefits may assist a credible option to have a positive net economic benefit and hence satisfy the RIT–D. Therefore, in this circumstance the quantification of market benefits is effectively required.

While there might be some ambiguity in the NER, the AEMC clarifies this in its final determination on the RIT–D:¹⁹

The Commission confirms that it is the intention of clause 5.17.1(d) that the quantification of market benefits is optional under the RIT–D. However, this clause must be read in conjunction with clause 5.17.1(b) which states that:

“(b) ...For the avoidance of doubt, a preferred option may, in the relevant circumstance, have a negative net economic benefit (that is, a net economic cost) where an identified need is for reliability corrective action.”

Therefore, where an identified need is not for reliability corrective action, a RIT–D proponent would need to quantify both the applicable costs and market benefits associated with each credible option in order for the preferred option to have a positive net economic benefit. On this basis, the quantification of market benefits under the RIT–D would be optional for reliability driven projects only.

Example 10: Market benefits

Market benefits with immaterial impacts

A RIT–D proponent's preferred option is to upgrade one of its substations. The RIT–D proponent expects that constructing this credible option will cost \$40 million. As a part of this upgrade, the RIT–D proponent proposes to install more efficient transformers.

Load at the region of the distribution network is 100 MW. Energy costs after generation are

¹⁸ AEMC, *Rule Determination: National Electricity Amendment (Distribution Network Planning and Expansion Framework) Rule 2012*, 11 October 2012, pp. 81–82.

¹⁹ AEMC, *Rule Determination, National Electricity Amendment (Distribution Network Planning and Expansion Framework) Rule 2012*, 11 October 2012, pp. 81–82.

\$11/MWh.

The RIT–D proponent expects the new transformers to marginally reduce electrical energy losses from 6.0 per cent to 5.9 per cent when operating at 100 MW.

Total losses are:

- In the base case: $\$11 * 0.06 * 100 \text{ MW} = \66 per hour.
- In the state of the world with the credible option: $\$11 * 0.059 * 100 \text{ MW} = \64.9 per hour.

Assuming the same conditions over 8,760 hours per year, the contribution of decreased network losses to the market benefit of the credible option is $(\$66 - \$64.9) * 8760 = \$9,636$ per year. As the net present value of such a benefit would only be approximately \$100,000, this could be considered immaterial given the cost of this credible option.

Market benefits that will not alter the selection of the preferred option

RIT–D proponents should quantify classes of market benefits that may affect the identification of the preferred option. For example, a RIT–D proponent is considering three credible options: a network option, a sophisticated demand side option, and a simple demand side option with a deferred network option.

Assume that each option has a similar cost and only has an impact on load shedding. The RIT–D proponent determines on reasonable grounds, that all three credible options will reduce involuntary load shedding by a very similar amount. However, the RIT–D proponent expects that these credible options will differ significantly in the changes in voluntary load shedding they produce.

The RIT–D proponent may not have to calculate the marginal differences in involuntary load shedding if this is irrelevant for identifying the preferred option. In this example, the RIT–D proponent may only need to quantify the changes in voluntary load shedding to identify the preferred option.

3.6.2 Additional classes of market benefits

NER clause 5.17.1(c)(4) requires RIT–D proponents consider whether each credible option could deliver specific classes of market benefits. Among this list, it includes classes of market benefits that we determine to be relevant.

If a RIT–D proponent wants to quantify a new class of market benefit in its RIT–D assessment, we will consider it if the RIT–D proponent receives approval from us before it makes its options screening report available to other parties. If the RIT–D proponent is not preparing an options screening report, we must provide approval before the RIT–D proponent publishes the notice of its determination stating that there are no non-network options or SAPS options that are credible options.

When determining whether to approve a new class of market benefit, we will consider whether the proposed benefit:

- Should already be reflected in another market benefit class. If it is effectively a component of a pre-existing class of benefits, there is no need to introduce a new class.

In these cases, the RIT–D proponent should consider whether it should perform an additional calculation to add this 'sub-component' into the market benefit class. If it has already captured this benefit indirectly, it should not perform a separate calculation that would result in double counting the value of the benefit.

- Would accrue to a producer, consumer or transporter of electricity in the NEM. If the class of benefit falls outside the scope of the NEM, the proponent should not include it in its cost benefit analysis (see section 3.11 for a discussion on externalities).

3.7 Methodology for valuing market benefits

The total benefit of a credible option includes the change in:

- consumer surplus, being the difference between what consumers are willing to pay for electricity and the price they are required to pay; and
- producer surplus, being the difference between what electricity producers and transporters receive in payment for their services and the cost of providing those services (excluding the costs of the credible option).

In applying the RIT–D, where the identified need for an investment is to increase market benefits, the market benefit of a credible option is obtained by:

- i. comparing, for each relevant reasonable scenario, the state of the world with the credible option in place with the state of the world in the base case in which the RIT–D proponent does not implement a credible option; and
- ii. weighting any benefits or costs in (i) by the probability of each reasonable scenario occurring.

If a deterministic reliability standard drives the identified need for reliability corrective action, a RIT–D proponent can select a credible option as a 'base case', rather than having to establish a base case where it does not implement a credible option to meet the identified need. However, for asset replacement or retirement projects, it will be clearer for the RIT–D proponent to adopt a 'BAU' base case, consistent with section 3.3.

Appendix A provides guidance and worked examples for calculating different classes of market benefits. In addition, the following sections provide guidance on valuing market benefits for a given credible option. A RIT–D proponent can obtain a market benefit for a credible option by:

1. **deriving** the states of the world with the credible option in place and in the 'base case' for each reasonable scenario;
2. **comparing** the relevant states of the world with the credible option in place and in the 'base case' for each reasonable scenario to derive the market benefit of the credible option in each reasonable scenario; and
3. **weighting** any market benefits or costs by the probability of each reasonable scenario occurring.

3.7.1 Deriving states of the world in each reasonable scenario

For each credible option, a RIT–D proponent must develop two states of the world (one with the credible option in place and the other being the base case) for each reasonable scenario. This allows the RIT–D proponent to later derive the market benefits of an option by comparing these states of the world, and then probability weighting those benefits across a range of reasonable scenarios.

Explanatory box 1 explains the difference between a 'state of the world' and a 'reasonable scenario'.

Explanatory box 1: States of the world versus reasonable scenarios

Reasonable scenarios are independent of the credible option, whereas states of the world are dependent on the credible option.

A state of the world is a detailed description of all of the relevant market supply and demand characteristics and conditions likely to prevail if a credible option proceeds or—if the credible option does not proceed—in the base case. A state of the world should be internally consistent in that all aspects of the state of the world could reasonably coexist.

In some cases, the development of new generation (incorporating capacity, technology, location and timing) may vary depending on which credible option RIT–D is implemented. Therefore, each credible option and the base case will be associated with a different state of the world reflecting different patterns of generation investment and other characteristics and conditions.

A reasonable scenario is a set of variables or parameters that are not expected to change across each of the relevant credible options or the base case. For example, the following variables should be independent of the credible options and considered as components of each reasonable scenario:

- levels of economic growth and the associated level of base electricity demand;
- level of population growth and the associated level of base electricity demand;
- unit capital and operating costs of generation plant (in \$/MW or \$/MWh);
- value of any environmental penalties; and
- value of unserved energy.

In a particular analysis, it may be appropriate to assess the benefits of a credible option across high, medium and low demand reasonable scenarios.

For the avoidance of doubt, to the extent that a demand-side option leads to lower peak demand under each of these reasonable scenarios, this effect should be accounted for in the states of the world associated with that option in each of those reasonable scenarios. This ensures that the benefits of the demand-side option are transparently calculated separately in high, medium and low demand scenarios, because such benefits of the demand-side option may vary according to the demand scenario.

Notwithstanding the need for probability weighting market benefits to derive the market benefit of a credible option, RIT–D proponents will continue to provide details of the

estimated market benefits of a credible option under each reasonable scenario.

When deriving all states of the world, RIT–D proponents must consider including:

- To the extent relevant, all existing assets and facilities at the time the RIT–D is applied. These must form a part of all states of the world, at least initially.²⁰
- Appropriate committed, anticipated and modelled projects, which are future investment in generation, network and load relevant to or contingent on any or all credible options proceeding or not proceeding.

Committed and anticipated projects should form a part of all states of the world, based on the reasonable judgement of RIT–D proponents.

The choice of modelled projects, if relevant, in a given state of the world will need to be determined based on appropriate market development modelling. This involves determining the kind of projects that would be undertaken in the longer term, with and without each credible option proceeding. Market development modelling must occur on a transparent and robust basis.

By enabling the derivation of modelled projects in the presence of a credible option and the base case, market development modelling assists in determining the market benefits of the credible option in a given reasonable scenario. For example, market development modelling may assist in determining whether, in high, medium or low demand reasonable scenarios, a demand side option is likely to lead to the deferral (or advancement) of new generation investment compared to other credible options. To the extent it does, this would constitute a positive (or negative) contribution to the market benefit of the credible option in each of those reasonable scenarios.

3.7.2 Deriving and weighting market benefits

RIT–D proponents estimate the market benefit of a credible option in a given reasonable scenario with each option in place against the base case. RIT–D proponents must derive the states of the world with each credible option and the base case to compare the associated states of the world across all reasonable scenarios. Example 11 below illustrates this step.

Example 11: Comparing states of the world under reliability corrective action

Two credible options (a network option and a demand side option) can meet an identified need to meet a service standard. There are three reasonable scenarios (high, medium and low demand). In this example, the RIT–D proponent must:

- **Derive** both a network option state of the world and a demand side option state of the world under conditions of high, medium and low demand. This will require developing six market modelling paths to establish the states of the world where this is a:
 1. network option and high demand;

²⁰ Reasonable scenarios may appropriately contemplate retirement of existing plant or facilities.

2. demand side option and high demand;
3. network option and medium demand;
4. demand side option and medium demand;
5. network option and low demand; and
6. demand side option and low demand.

- **Compare** the states of the world under each credible option. This requires comparing state of the world (1) against (2), (3) against (4) and (5) against (6). Treating the network option as the base case credible option yields the relative market benefits of the demand side option as compared to the network option in each of the three reasonable scenarios.

Assume that in the network option states of the world, the RIT–D proponent estimates the following costs of generation and involuntary load shedding:

- \$30 million in a high demand scenario;
- \$20 million in a medium demand scenario; and
- \$10 million in a low demand scenario.

Assume that in the demand side option states of the world, the RIT–D proponent estimates the following costs of generation and voluntary load curtailment (assume there is no involuntary load shedding under the demand side option state of the world):

- \$60 million in a high demand scenario;
- \$40 million in a medium demand scenario; and
- \$15 million in a low demand scenario.

This means that the demand side option has relative market benefits of:

- negative \$30 million in a high demand scenario;
- negative \$20 million in a medium demand scenario; and
- negative \$5 million in a low demand scenario.

The final step is to weight the market benefits of each credible option in each reasonable scenario. Assume the following probabilities of each reasonable scenario occurring:

- high demand scenario is 50 per cent;
- medium demand scenario is 40 per cent; and
- low demand scenario is 10 per cent.

Under these assumptions, the relative market benefits of the demand side option are: $-\$23.5$ million ($0.5 * -\$30$ million + $0.4 * -\$20$ million + $0.1 * -\$5$ million).

Note: this example incorporates the negative utility from voluntary load curtailment as a negative market benefit. This approach avoids the need to count load curtailment payments

to consumers as part of the option's costs. This means the option's costs will be limited to the fees/commissions of the demand side aggregator or energy service company. If those fees/commissions are at least \$23.5 million less than the costs of the network option, the demand side option will provide a higher net economic benefit and be the preferred option.

3.7.3 Categories of market benefits

Broadly speaking, the market benefit of a credible option predominately reflects savings in:

- capital costs, including the costs of generation and network assets;
- operating costs, including fuel costs, network losses, ancillary services, as well as voluntary and involuntary load reduction; and
- where applicable and material, the costs of meeting mandated government targets, such as the renewable energy target (RET) or similar developments (like a potential National Energy Guarantee or similar).

The RIT–T application guidelines provides worked examples on estimating these categories of savings. While these worked examples will generally be more relevant to transmission network investments, there may be some instances where this guidance will be relevant and useful to distribution network investments. If a distribution business is considering a credible option that it expects will have wholesale market or inter-regional impacts, they should consider section 3.7.3 of the RIT–T application guidelines.

Given there has been an increased demand for guidance on accounting for government policies, as well as the need to consider interregional impacts of investments, we provide some additional guidance on these areas below. Nevertheless, we also acknowledge that this guidance may only be relevant to some RIT–D projects.

Cost savings in meeting mandated targets

Some credible options in RIT–Ds might produce a material NEM-wide saving in meeting an environmental, reliability or other mandated target (for example, the Australian or jurisdictional RETs or some form of National Energy Guarantee). If or where this occurs, a RIT–D proponent can calculate this expected saving by comparing plant development and load-flow (or market dispatch, where relevant) outcomes for a credible option to the base case.

In the absence of any price caps or penalties, it is reasonable to assume that the market will meet an applicable mandated target, like the RET. Using the RET as an example, a RIT–D proponent could assume that the price of a renewable energy certificate would rise to the level necessary to induce compliance with the target. Therefore, under any state of the world, the benefits from meeting that target will be identical and need not be included in the RIT–D. Rather, the differences in other costs under the RIT–D will reflect any differences in the resource costs of meeting these targets under different states of the world.

It may be that there is a cap on prices (renewable energy certificates, in the case of the RET) or a penalty for not meeting the relevant target. In this case, it would be reasonable to assume that this cap or penalty reflects the maximum per unit benefit to the NEM of

providing the relevant service (renewable energy, in the case of the RET). In such a case, it may not be net beneficial for the NEM to meet the target because the cost of meeting the target could exceed the benefits, as indicated by the level of the cap or penalty. As such, a RIT–D proponent can consider the benefits associated with the target in each state of the world equivalent, even where the target is not met due to it being lower cost to pay the cap or penalty price.

Using the RET as an example, in a state of the world where the RET is not met, the amount of renewable energy short of the target will be valued at the capped price and contribute to the resource costs in that state of the world. Comparing the resource costs in different states of the world may then make a positive or negative contribution to the market benefits of a credible option.

For additional guidance on how to treat the tax deductibility of RETs, and a worked example on calculating the costs savings in meeting a RET, see section 3.7.3 of the RIT–T application guidelines.

Benefits accruing across regions

Unlike the RIT–T provisions, the NER do not require the RIT–D application guidelines to specify which methods a RIT–D proponent can use to estimate market benefits that may occur outside its network. Nevertheless, we provide some high level guidance to assist RIT–D proponents in estimating market benefits that accrue across regions because:

- RIT–D proponents must consider whether credible options could deliver changes in costs for parties other than themselves due to differences in the timing of new plant, capital costs, and operating and maintenance costs.²¹
- In our view, the increasingly distributed nature of electricity and the increased potential to orchestrate distributed energy resources has increased the potential for distribution-level investments to provide material benefits to different regions of the NEM.
- In our view, because the transition to a greater reliance on intermittent generation resources is increasing the complexity of network planning, it has become increasingly important to consider the systemic impacts of individual network investments when assessing whether a given investment will maximise net economic benefits across the NEM.

Our more general guidance on estimating benefits, such as the methods outlined above, also applies to quantifying benefits that accrue in more than one region. RIT–D proponents need not separately quantify benefits that arise in each region of the NEM. Nevertheless, in calculating benefits that accrue to other regions in the NEM, we suggest that RIT–D proponents:

- Liaise with producers, consumers and transporters of electricity in other regions of the NEM to inform their understanding of how different credible options will affect them. If the RIT–D proponent is exploring credible options that it expects will 'materially affect'

²¹ See NER 5.17.1(c)(4)(iii).

another electricity network, we would expect the proponent to instigate a joint-planning project with that other electricity network. In this context, 'materially affect' means it will create an identified need sufficiently large that it will require a RIT–T or RIT–D project to meet it.

- Have regard to AEMO's NTNDP, ISP, or equivalent document to inform their understanding of how different credible options will fit into or affect the broader development of the NEM.

3.8 Reasonable scenarios and sensitivities

NER clause 5.17.1 requires RIT–D proponents to base the RIT–D assessment on a cost benefit analysis that includes an assessment of reasonable scenarios of future supply and demand. For example, in assessing two credible options, a RIT–D proponent might formulate a reasonable scenario based on a set of input assumptions that it considers reasonable. These might include, for instance:

- medium base forecast electricity demand;
- a discount rate of 6.5 per cent; and
- medium capital and operating costs for existing, committed, anticipated and modelled generation projects.

In this example, this set of inputs would represent the central reasonable scenario with which the RIT–D proponent can proceed to calculate the net economic benefit of the two credible options. However, depending on the nature of the options being assessed, the use of additional reasonable scenarios may be appropriate.

This section provides guidance on forming reasonable scenarios, including:

- Selecting an appropriate number of reasonable scenarios; and
- Giving consideration to high impact low probability (HILP) events.

3.8.1 Testing sensitivities to select reasonable scenarios

Under the RIT–D, the number and choice of reasonable scenarios must be appropriate to the credible options under consideration. Specifically, the choice of reasonable scenarios must reflect any variables or parameters that are likely to affect:

- the ranking of the credible options, where the identified need is for reliability corrective action and therefore only the ranking is important; and
- the ranking or the sign of the net economic benefits of any of the credible options, for identified needs other than reliability corrective action.

NER clause 5.17.1(c)(2) states that the RIT–D must not require a level of analysis that is disproportionate to the scale and likely impact of each credible option considered. Consequently, the appropriate number and choice of reasonable scenarios is likely to vary for each set of credible options.

These requirements mean that the appropriate number and choice of reasonable scenarios is likely to vary for each set of credible options under consideration. As such, we cannot prescribe these requirements in advance. We do not intend to specify the appropriateness (or otherwise) of a particular number of reasonable scenarios in a given set of circumstances. However, as guidance, when developing reasonable scenarios, we recommend RIT–D proponents:

- Use sensitivity analysis to assist in determining an appropriate set of reasonable scenarios. We describe this approach in the following paragraphs.
- As a principle, be conscious of the current NEM reforms and relevant policy developments, including:
 - Electricity pricing reforms.
 - The development of new markets and products, such as demand response markets and products that allow consumers to select their own price-reliability preference.
 - Policies relating to features of the NEM, such as those concerning carbon emissions, renewable energy, reliability, energy security and other factors. For example, if evidence supports there being a reasonable possibility of policy change (including introducing a new policy or altering/withdrawing a current policy) that could affect the ranking or sign of credible options (or just the ranking, if the identified need was for reliability corrective action), the RIT–D proponent should include a reasonable scenario where this policy change occurs.
- Construct scenarios that are genuinely reasonable, in that they comprise of internally consistent parameters so that they can define a reasonable range of plausible states of the world.
- Where appropriate, have regard to AEMO's work in developing modelling forecasts, scenarios and assumptions, such as the information provided in the ISP (see section 3.4.1 for more information on using information that AEMO publishes).

The following paragraphs further explain the first dot point above—that is, how the development of additional reasonable scenarios involves a process of applying sensitivity analysis to key input variables that will likely affect the performance of credible options. Such inputs might include those relating to technology costs, fuel costs, distributed generation and storage growth.

It may be that a reasonable change to the value of a parameter changes the ranking of credible options by net economic benefit. In such cases, the RIT–D proponent should explore states of the world under a reasonable scenario that is consistent with that different, yet reasonable, parameter value.

For example, sensitivity analysis might show that the relative performance of credible options changes if there are high (yet, not unreasonably high) technology costs. On this basis, a RIT–D proponent should explore different states of the world under a reasonable scenario that is consistent with high technology costs.

Explanatory box 2: Sensitivity analysis versus scenario analysis

This section of the RIT–D application guidelines recommends using sensitivity analysis as a tool to assist in selecting the appropriate scenarios to use when performing scenario analysis. As such, it is beneficial to distinguish these concepts.

Sensitivity analysis entails varying one or multiple inputs to test how robust the output of an analysis or model is to its input assumptions. For example, we suggest that if the results of the analysis in one reasonable scenario appear to be sensitive to a particular input (say, forecast electricity demand), this provides a strong basis to explore reasonable scenarios that incorporate different levels of that input more holistically. For example, this might entail adopting a range of scenarios where there is particularly high or low load growth.

It is worth noting that we do not recommend limiting the use of sensitivity analysis to selecting reasonable scenarios. After identifying the preferred option, the RIT–D proponent should illustrate 'boundary values' for important input assumptions (such as the discount rate and VCR) at which the preferred option changes. The RIT–D proponent can then discuss the plausibility of that value and evaluate the risk of that credible option.

Scenario analysis focuses on describing different sets of states of the world that reflect common values of particular parameters that are relevant to the investment decision. For example, a reasonable scenario will reflect a common set of values for the rate of demand growth, fuel costs, technology costs and environmental target(s). Under the RIT–D, the use of scenario analysis to assess a credible option entails:

- Developing/describing different scenarios based on a range of parameters, which the RIT–D refers to as 'reasonable scenarios'; and then
- Exploring how different projects (credible options) produce different outcomes (states of the world) under a range of different reasonable scenarios.

Through this, RIT–D proponents gain a comprehensive understanding of what states of the world could arise with and without a credible option in place under different sets of external circumstances. For a given credible option, a RIT–D proponent then probabilistically weights the outcomes (the states of the world under that option relative to the base case) across the different reasonable scenarios to derive that option's expected net market benefit.

For example, drawing from example 11 above, a RIT–D proponent could choose to undertake a sensitivity analysis on demand. This will determine whether the ranking of credible options by net economic benefit changes if demand grows faster or slower than anticipated, assuming no change in new generation costs (which are assumed to be independent of demand growth). In some cases, where relevant and appropriate, sensitivity analysis may include using plant expansion modelling to capture changes in one variable (such as demand) on other inputs, such as new generation investment.

Example 12 illustrates how a RIT–D proponent could undertake a sensitivity analysis of forecast demand.

Example 12: Demand sensitivity

Assume a RIT–D proponent is exploring an augmentation project for reliability corrective action (that is, to meet a deterministic reliability standard). In this example, the RIT–D proponent chooses a 'base case credible option'.

Assume there are two credible options:

1. augmenting a distribution line at a cost of \$60 million (taken as the 'base case' option); and
2. contracting with an embedded generator to provide additional peak demand support at a cost of \$15 million.

The RIT–D proponent forecasts that energy and peak demand in the region will grow by 3 per cent over the period of the analysis.

In the central reasonable scenario, the relative market benefits of the embedded generation credible option will be determined as follows:

- Variable electricity supply costs will be higher than under the base case network augmentation option because the embedded generator is likely to have a higher variable cost than a remote generator. This makes a negative contribution to the embedded generation option's relative market benefits.
- Fixed new generation costs (excluding the cost of the embedded generator option itself) will be lower than under the base case network augmentation option. This is because the embedded generator postpones the need for new generation from year 5 in the base case to year 10. This makes a positive contribution to the embedded generation option's relative market benefits.

Assume that the RIT–D proponent calculates the relative market benefits of the embedded generation credible option as –\$40 million. As the costs of the embedded generator credible option are lower than the costs of the network augmentation credible option, the relative costs of the embedded generator will be negative, –\$45 million. This results in a relative net economic benefit of the embedded generation credible option of \$5 million.

The RIT–D proponent now runs a sensitivity analysis on the projected growth in energy and peak demand. Under the sensitivity analysis, growth in energy and peak demand in the region will be 10 per cent over the period of the analysis, instead of 3 per cent.

In the modified high demand scenario, the relative market benefits of the embedded generation credible option will change from that in the central reasonable scenario in that:

- The relative total variable electricity costs will be higher than under the central reasonable scenario, because more high-cost electricity from the embedded generator will be consumed over the assessment period. This should further reduce the embedded generation option's relative market benefits.
- The relative new generation fixed costs will be lower than under the central reasonable scenario, because more generation investment will be required over the assessment period even if the augmentation proceeds. This should further reduce the embedded generation option's relative market benefits.

Accordingly, the RIT–D proponent calculates the relative market benefit of the embedded generation connection credible option is –\$55 million. Assuming the project’s costs have not changed, the relative net economic benefit of the embedded generation connection credible option is now –\$10 million.

The analysis shows that, in the event that growth in energy and peak demand is higher than forecast, the ranking of net economic benefit between the two credible options may change. Therefore, it would be worthwhile for the RIT–D proponent to adopt additional reasonable scenarios with varying levels of forecast demand in its assessment of the credible options.

The impact of sensitivity analysis on the number and choice of reasonable scenarios used to assess a particular set of credible options will vary according to the circumstances surrounding the RIT–D assessment. Further, there may be other approaches for deriving the appropriate number and choice of reasonable scenarios for each set of credible options under consideration.

3.8.2 Modelling and analysis required under the RIT–D

Once a RIT–D proponent has formulated an appropriate number and choice of reasonable scenarios, it will need to calculate the market benefits of each credible option arising under each reasonable scenario. These market benefits would then need to be probability-weighted to derive the relevant market benefits of each credible option. We discuss the process earlier on in section 3.8.

The number of reasonable scenarios and credible options used in a particular RIT–D assessment will have a major influence on the extent of modelling and analysis for the RIT–D proponent to undertake.

Assume that a RIT–D proponent has undertaken appropriate sensitivity analysis and chooses to assess a \$30 million investment to upgrade a zone substation to accommodate expected load growth (option 1). The RIT–D proponent assesses the project:

- against a 'do nothing' base case (base case);
- against one alternative credible option (option 2);
- based on a single set of capital and operating costs for existing, committed, anticipated and modelled projects;
- based on two alternative demand forecasts; and
- using two alternative materials costs.

This would require the development of:

- four reasonable scenarios—encompassing two different demand levels (high and low) and two different materials costs; and
- 12 states of the world, reflecting one set of reasonable scenarios for option 1, option 2 and the base case.

Table 2: Modelling and analysis under the RIT–D

Reasonable scenario	Credible option	State of the world
1: High demand, low materials costs	Base case	1
1: High demand, low materials costs	Option 1	2
1: High demand, low materials costs	Option 2	3
2: High demand, high materials costs	Base case	4
2: High demand, high materials costs	Option 1	5
2: High demand, high materials costs	Option 2	6
3: Low demand, materials costs	Base case	7
3: Low demand, low materials costs	Option 1	8
3: Low demand, low materials costs	Option 2	9
4: Low demand, high materials costs	Base case	10
4: Low demand, high materials costs	Option 1	11
4: Low demand, high materials costs	Option 2	12

As reflected previously in example 12, where relevant, a RIT–D proponent may also need to model a separate market development path for each state of the world to identify whether different options or changes in scenarios affect pattern of new plant development. However, this will not always be feasible or necessary.

If RIT–D proponents varied some of the input assumptions further, then the number of reasonable scenarios, market development paths and required states of the world would multiply.

3.8.3 High impact, low probability events

A RIT–D can appropriately capture the economic impacts of high-impact, low probability (HILP) events using scenario analysis, which entails following these RIT–D application guidelines in:

- Exploring reasonable scenarios where relevant HILP events occur. For guidance on selecting reasonable scenarios, see section 3.8.1.
- Costing the impact of that HILP event occurring. In costing this event, we would expect the RIT–D proponent include the market benefit categories, changes in involuntary and voluntary load shedding. In valuing these changes in market benefits, the RIT–D proponent should use a VCR that is appropriate to the range and duration of customers that the HILP event would affect. If the appropriate VCR for the HILP event requires a departure from or adjustment to an accepted estimate such as those produced by AEMO, or by us from 31 December 2019, the RIT–D proponent should have supporting evidence to clearly justify this departure or adjustment. In coming to such a decision, we would expect the RIT–D proponent to consult directly with both us and the customers to whom the VCR applies. For guidance on selecting VCR inputs, see section 3.4.3.

- Weighting the economic impact of the event by a reasonable estimate of its probability of occurring. For clarity, weighting these events differently to their probability of occurring could distort the RIT–D outcome and undermine transparency. For more information on weighting reasonable scenarios, see sections 3.8.2 and 3.9.

A RIT–D proponent can also use sensitivity testing to explore the robustness of different credible options to risks, including HILP events.

When exploring the economic impacts of HILP events, RIT–D proponents should:

- Explore the viability and effectiveness of non-network options and SAPS options in managing or responding to the effects of HILP events.
- Recognise the different factors influencing the impact of certain HILP events. For instance, RIT–D proponents should have regard to AEMO’s role in determining new ‘protected events’ when considering the impact of HILP events.
- Avoid skewing the results. This can be achieved by assuming that:
 - The HILP event occurred in the context of reasonable BAU actions.
 - The industry responded responsibly and efficiently to the HILP event.

3.9 Uncertainty and risk

We recognise that at the time of applying a RIT–D, the future will be uncertain. This section provides information and guidance on how a RIT–D proponent can respond to this uncertainty when applying the RIT–D.

3.9.1 Uncertainty regarding market benefits

The first step in taking account of material uncertainty over future market supply and demand conditions is to formulate a set of reasonable scenarios that reasonably reflect potential future market conditions. The process for deriving reasonable scenarios is discussed section 3.8.1.

The next step is for the RIT–D proponent to assign a reasonable probability to each of these reasonable scenarios occurring in practice. The need to attribute probabilities to each reasonable scenario is unavoidable if the RIT–D is to transparently produce a clear ranking of credible options. We do not expect the RIT–D proponent to ascribe an exact probability to every scenario.

For example, it is sufficient for a proponent to attach a 20 per cent probability to a scenario, as opposed to 23 per cent. We do not intend for relatively small divergences of views over reasonable scenario probabilities to become a source of dispute. Rather, the RIT–D proponent must be able to provide a sound reason for its use of particular probabilities based on the information it has or reasonably ought to have had available when it made the assessment and given the nature of the credible options under consideration.

The market benefit of a credible option is the probability-weighted sum of all market benefits of that option across all reasonable scenarios. The methodology for assigning probabilities to

each reasonable scenario will depend on the methodology for defining the reasonable scenario. For example, where there is uncertainty about future demand, two different methodologies are possible:

- Approach 1—a range of equally-spaced values for future demand, and probability weightings for each of these values are chosen. Extreme values of future demand will receive lower probabilities than values closer to the mean.
- Approach 2— RIT–D proponents will rank different values for future demand. After RIT–D proponents rank these values, they will divide them into groups—quartiles, or deciles, and so on. The RIT–D proponents will then select a representative value for demand from each group. The probability assigned to each representative value is the same for example, 25 per cent in the case of quartiles and 10 per cent in the case of deciles. Under this approach, the probability of each demand value arising is constant, but the chosen representative demand values are likely to be grouped closer together for values of demand closer to the mean.

Either approach is acceptable. However the methodology for assigning probabilities to each reasonable scenario must be consistent with the methodology for choosing the reasonable scenarios.

Where a RIT–D proponent does not reasonably consider one reasonable scenario is more likely than any other, they may weight all reasonable scenarios equally.

Example 13: Market benefits across probability weighted reasonable scenarios

Assume a deterministic reliability standard is driving a need to augment the network. A RIT–D proponent is considering three credible options to address an identified need for reliability corrective action across four reasonable scenarios.

The three credible options are a:

- Network option (the RIT–D proponent chooses to adopt this as the base case option).
- Distributed generation option.
- Demand side participation option.

The four reasonable scenarios and their probabilities of occurrence are:

- High capital costs, high demand (scenario 1) – 10%.
- High capital cost, low demand (scenario 2) – 30%.
- Low capital costs, high demand (scenario 3) – 10%.
- Low capital costs, low demand (scenario 4) – 50%.

Table 3 shows the performance of the two other credible options across each of the four reasonable scenarios according to their relative market benefits over the base case option (which by definition has a relative market benefit of zero).

Table 3: Relative market benefits across reasonable scenarios (\$m)

Credible option	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Base case network option	0	0	0	0
Distributed generation option	3	11	-5	7
Demand side option	-5	20	-35	4

For each other credible option, the RIT–D proponent must weight the relative market benefit under each reasonable scenario by that reasonable scenario’s probability of occurrence. Calculating the probability-weighted relative market benefit across the range of reasonable scenarios requires analysis from the results generated in table 3. Table 4 therefore generates one relative market benefit estimate for each other credible option.

Table 4: Probability weighted relative market benefits (\$m)

Credible option	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Sum of probability-weighted scenarios
Base case network option	0	0	0	0	0
Distributed generation option	0.3	3.3	-0.5	3.5	6.6
Demand side participation option	-5	6	-3.5	2	4

3.9.2 Uncertainty regarding costs

The cost of the credible option is the probability weighted present value of the direct costs of the credible option under the different cost assumptions. Where the identified need is for reliability corrective action and the RIT–D proponent has selected a credible as its base case, costs refer to incremental costs above (or below) that base case credible option.

For the avoidance of doubt, 'cost assumptions' are distinct from the reference to costs within reasonable scenarios as used elsewhere in the RIT–D and the RIT–D application guidelines. Here, 'cost assumptions' refers to the costs of each credible option. Elsewhere, in the context of reasonable scenarios, cost assumptions refers to the costs of existing, committed, anticipated and modelled projects that may arise within the relevant reasonable scenario.

The direct costs of a credible option may vary for reasons other than the nature of the relevant reasonable scenario. For example, the direct costs of a credible option may be uncertain because they depend on variables such as exchange rates or the price of copper. Similarly, whether a reasonable scenario reflects high or low demand growth is unlikely to affect the costs of a credible option. This is why the RIT–D requires the RIT–D proponent to separately undertake a weighted averaging of the direct costs and the market benefits of a credible option.

As with the probabilities assigned to reasonable scenarios, the probabilities assigned to different costs need only be broadly reasonable given the information available or

reasonably available to the RIT–D proponent and the nature of the credible option under consideration.

Example 14 illustrates calculating expected costs. It follows on from example 13 above.

Example 14: Calculating expected costs

For each of the three credible options, the RIT–D proponent also considered three cost assumptions ('low', 'medium' and 'high'). The three cost assumptions and associated probabilities of occurrence for each credible option are:

- Base case network option:
 - Low (low steel prices; favourable exchange rate) = 20%.
 - Medium (medium steel prices; average exchange rate) = 50%.
 - High (high steel prices; unfavourable exchange rate) = 30%.
- Distributed generation option:
 - Low (low steel prices, low labour costs) = 10%.
 - Medium (medium steel prices; medium labour costs) = 50%.
 - High (high steel prices; high labour costs) = 40%.
- Demand side participation option:
 - Low (low implementation and maintenance costs) = 30%.
 - Medium (medium implementation and maintenance costs) = 50%.
 - High (high implementation and maintenance costs) = 20%.

A RIT–D proponent can calculate an expected cost for each credible option by taking a weighted-average across cost assumptions. This is set out in table 5 below.

Table 5: Calculating expected cost (\$m)

Credible option	Low cost scenario	Medium cost scenario	High cost scenario	Expected cost	Expected relative cost
Base case network option	7.5	10	17.5	11.8	0
Distributed generation option	8	12	14	12.4	0.6
Demand side option	0.4	0.5	0.75	0.5	-11.3

3.9.3 Option value

NER clause 5.17.1(c)(4)(vi) requires RIT–D proponents to consider option value as a class of potential market benefit. Option value is a benefit resulting from retaining flexibility where

certain actions are irreversible (sunk), and new information may later arise on the payoff from taking a certain action.

It is important for RIT–D proponents to consider option value because many network investment decisions are partially or fully irreversible. In some cases, past decisions are reversible at an increased cost. For example, a RIT–D proponent might purchase land for a substation where land is inexpensive. If it later determines that more land is required but the surrounding areas are fully developed, expanding the substation might remain feasible but significantly costlier.

A RIT–D proponent might expect that information will later become available that affects the net economic benefit of a partially or fully irreversible action that it is deciding to carry out. In such circumstances, there should be value in retaining some flexibility to respond to that new information when it emerges. For example, if demand for a distribution line is uncertain but might increase, a RIT–D proponent might wish to retain the flexibility to expand the capacity of the line at a relatively low cost in the future. If demand for a distribution line is uncertain but might decrease, a RIT–D proponent may prefer to implement a temporary (perhaps a non-network) solution to congestion problems, and defer a major sunk investment until the demand for the distribution line is clear.

Capturing option value when applying a RIT–D

Where the future is uncertain, the RIT–D proponent may consider investment options that retain some flexibility and allow it to respond to any new information that arises. For example, where there is material uncertainty about future demand growth, the set of credible options could include an option that allows the RIT–D proponent to make a smaller network investment now, but retain flexibility to upgrade the line at reduced cost later.

RIT–D proponents can make investment decisions that capture these benefits of retaining flexibility, or 'account for option value' by performing scenario analysis consistently with these RIT–D application guidelines, thereby valuing how the net benefits of different credible options vary under different scenarios. In identifying credible options, RIT–D proponents should be considering credible options where the decision-maker is able to change its action in response to new information. Where this type of credible option is available (that is, an option that has flexibility built into it), we can see the RIT–D as allowing for two stages: 1) whether to commit to an option with built-in flexibility, and 2) whether to partially or completely reverse the earlier decision.

Decision rules and visual aids can assist the RIT–D proponent to value the option it can exercise in stage 2) above. As noted in section 3.2, RIT–D proponents can formulate credible options incorporating a decision rule or policy regarding how the RIT–D proponent will respond to certain changes in variables. Visual aids such as 'tree' diagrams can often represent such rules or policies (see figure 8). Example 30 in appendix A provides a stylised example of how RIT–D proponents can capture option value when applying RIT–Ds through using visual aids and decision rules.

For clarity, the RIT–D allows RIT–D proponents to capture option value beyond what they have otherwise captured by probabilistically weighting credible options over reasonable scenarios, as long as it is not double-counted.²²

3.10 Selecting the preferred option

Under the RIT–D, the preferred option is the credible option that maximises the net economic benefit to all those who produce, consume and transport electricity in the NEM. Where an identified need is for reliability corrective action, the preferred option may have a net economic cost.²³ The net economic benefit of a credible option is the market benefit less the costs of the credible option.

A credible option is a project, or set of projects, established to meet an identified need. A set of projects may constitute one credible option in the form of an integrated solution to meet an identified need.

Example 15: Selecting a preferred option

A RIT–D proponent has identified five credible options. For each credible option, the RIT–D proponent quantified the costs and market benefits. The RIT–D proponent then deducted the costs from the market benefits to derive the net economic benefit.

The credible option with the highest net economic benefit receives the highest ranking. The RIT–D proponent therefore identifies this credible option as the preferred option. The preferred option in this example is the demand side option combined with a network option.

Table 6: Calculating expected net economic benefit (\$m)

Credible option	Market benefits	Costs	Net economic benefit	Ranking
Network option 1	11.3	11.9	-0.6	5
Network option 2	18	17	1	3
Embedded generation option	13.5	12.4	1.1	2
Demand side option	0.9	0.5	0.4	4
Demand side option, combined with a network option	14	12	2	1

3.11 Externalities

²² Specifically, RIT–D paragraph (7)(f) provides that market benefit includes the present value of 'any additional option value (where this value has not already been included in other classes of market benefits) gained or foregone from implementing the credible option with respect to the likely future investment needs of the NEM'.

²³ NER, cl. 5.17.1(b).

The RIT–D seeks to identify the credible option that maximises the present value of the net economic benefit to all those who produce, consume and transport electricity in the NEM. Consequently, the RIT–D considers economic impacts that accrue to parties other than those who produce, consume and transport electricity in the NEM as externalities.

Clause 5.17.1(c)(4) of the NER requires the RIT–D proponent to consider whether each credible option could deliver specified classes of market benefits. Similarly, NER clause 5.17.1(c)(6) requires the RIT–D proponent to consider whether each credible option would be associated with various classes of costs. These clauses do not require RIT–D proponents to consider externalities as costs or market benefits of a credible option. Therefore, externalities should not be included in the determination of the net economic benefit.

We interpret that, 'all those who...consume...electricity in the NEM' in NER clause 5.17.1(b) refers to costs or market benefits incurred or obtained, respectively, by parties in their capacity as consumers of electricity. Thus, RIT–D proponents should exclude costs or market benefits that are incidental or consequential to parties' electricity consumption from their RIT–D analysis. For further explanation, example 16 illustrates negative and positive externalities.

Example 16: Changes in property values

To support increased consumer demand for electricity, a RIT–D proponent explores augmenting the distribution network by installing a new substation and electricity wires.

The RIT–D proponent expects this augmentation will decrease the visual aesthetics of that region. Residents around the new substation were also concerned that the new plant could cause negative health impacts. Consequently, in the state of the world with this credible option in place, the RIT–D proponent expects property prices around this area of the network would be 2 per cent lower than under the base case state of the world.

The RIT–D proponent cannot measure the decrease in visual aesthetics and the decrease in property values as a negative market benefit to persons in their capacity as generators, transporters (that is, network businesses) or consumers of electricity. Therefore, the RIT–D proponent would consider it an externality and exclude it from its RIT–D analysis.

3.11.1 Externalities and external funding contributions

Our guidance that RIT–D proponents must exclude externalities from their RIT–D assessments has a bearing on how RIT–D proponents should treat external project funding for a credible option differently depending on whether it has or will be provided by:

- A Registered Participant under the NER or any other party in their capacity as a consumer, producer or transporter of electricity in the NEM (a Participant)²⁴; or

²⁴ For clarity, by including parties in their capacity as producers and/or transporters of electricity, this definition captures entities such as distributed energy resources suppliers and energy service companies, that may wish to support (and implicitly, discourage) particular credible options from which they benefit in a RIT–D. Such an entity could provide this support directly as a proponent of a non-network option or SAPS option, or indirectly via subsidies to end-use consumers

- Any other party (Other Party).

As example 17 illustrates, funds that move between Participants count as a wealth transfer and should not affect the calculation of the final net economic benefit under the RIT–D. This wealth transfer occurs because the benefit gained by the Participant receiving the external funds (that is, the reduction in the required outlay by the RIT–D proponent in providing the credible option) is directly offset by the cost (or negative market benefit) incurred by the other Participant providing the external funds.

As example 18 illustrates, funds from an Other Party to a Participant should increase the net economic benefit of the option. This occurs because the benefit gained by the Participant receiving the external funds (that is, the reduction in the required outlay by the RIT–D proponent in providing the credible option) is not offset by the cost incurred (or negative net market benefit) by the Other Party in providing the external funds. This is because the costs and benefits to the Other Party are outside the scope of the RIT–D cost–benefit analysis, which is limited to producers, consumers and transporters of electricity in the NEM. As such, these external funds increase the final net economic benefit calculated under a RIT–D.

While funds from an Other Party to a Participant in connection with a credible option increases the net economic benefit of that option, RIT–D proponents should report the expected net economic benefit of different credible options in absence of such funds, as well as after receiving these funds. Doing this will increase the transparency of the RIT–D, allowing stakeholders to understand what is driving the results of the cost–benefit analysis.

Example 17: Funding from a Participant

A retailer wishes to support developing a virtual power plant (VPP) to facilitate increased generation from distributed energy resources at times of high wholesale spot prices, as well as network support services when the existing distribution network is constrained. Assume:

- The RIT–D proponent estimates the present value of augmenting the network infrastructure to support the VPP (including supporting new storage connections and improving control systems) and the lifetime operating and maintenance costs of the VPP are \$7 million.
- The RIT–D proponent estimates that the present value of the market benefits of the VPP are \$6 million.
- The retailer wishes to contribute \$2 million to the proponent of the VPP, being the distribution business in the region because the present value of its expected benefit from the VPP is \$3 million. As such, the retailer's decision to contribute \$3 million is a rational decision that would allow the project to go ahead so that it is \$1 million better off.

As the retailer is a Participant, its \$2 million contribution to the proponent distribution business does not increase the net benefits of the VPP option for the purposes of a RIT–D assessment. The retailer's \$2 million contribution is treated as a voluntary wealth transfer

to encourage take-up of non-network options or SAPS options.

between the retailer and the distribution business and has no impact on the net economic benefit of the project.

Moreover, if the retailer's expected \$3 million benefit was a market benefit (say, it allows the retailer to better able to manage its exposure to the spot market), then this contribution should already be included in the \$6 million expected benefit. If that market benefit was not entirely captured in the \$6 million (for reasons such as oversight or immateriality), the retailer's proposal to provide the \$2 million contribution would be a reasonable basis for the RIT–D proponent to explore whether it has included relevant and material market benefits in the RIT–D analysis

Example 18: Funding from another party

Taking example 17, assume that now the jurisdictional government wishes to support the development of the VPP given it has social benefits relating to supporting innovation and renewable energy.

Rather than the retailer, the government wishes to contribute \$2 million to the proponent of the VPP, being the distribution business in the government's region.

As the government is not a Registered Participant and is not making the contribution in its capacity as a producer, consumer or transporter of electricity in the NEM, the government's \$2 million contribution to the proponent distribution business reduces the cost of the VPP option for the purposes of a RIT–D assessment. Given this, the present value net economic benefits of the VPP changes from being negative \$1 million (\$6 million – \$7 million), to being positive \$1 million (\$6 million – \$7 million + \$2 million). That is, the government's \$2 million contribution is effectively treated as a reduction in costs borne by those who consume, produce and transport electricity in the market in relation to the VPP option.

3.12 Suitable modelling periods

The duration of modelling periods should take into account the size, complexity and expected life of the relevant credible option. The modelling period should provide a reasonable indication of the market benefits and costs of the credible option. This means that by the end of the modelling period, the network is in a 'similar state' in relation to meeting a similar identified need to where it is at the time of the investment. The suitable modelling period could vary according to the credible option under consideration. However, to the extent possible, the RIT–D proponent should construct credible options (using individual options) that require assessment under similar modelling periods.

It is difficult to provide definitive guidance on how RIT–D proponents should implement this principle. However, it is unlikely that a period of less than 5 years would adequately reflect the market benefits of any credible option. In the case of high-cost investments that provide a return over a longer period, it may be necessary to adopt a modelling period of 20 years or more. Moreover, RIT–D proponents should also consider including any relevant and material terminal values into their discounted cash flow analysis, where appropriate.

When considering longer modelling periods, a RIT–D proponent may find that costs and market benefits may eventually become immaterial due to discounting future costs. Under

such circumstances, a RIT–D proponent may exercise discretion when selecting a suitable modelling period so that the RIT–D does not require a level of analysis that is disproportionate to the scale and likely impact of the credible options being considered.

Example 19: Suitable modelling periods

The identified need is to maintain reliability under conditions of rising peak load. The RIT–D proponent has identified two credible options that could achieve this:

- Option 1: Increase capacity in the section of the network to take up load by 10 per cent. This will be achieved through network augmentation.
- Option 2: Decrease peak demand through a demand side participation program so that the existing network can serve an increase in the pre-demand side participation peak load of 10 per cent.

Under the Option 1, the RIT–D proponent will build the plant in year 4. Project planning will commence in year 2. The RIT–D proponent expects the new plant will satisfy the capacity needs on the section of the distribution network until year 20, after which it will consider more options for meeting the identified need. In this case, a suitable modelling period would be 20 years.

Under Option 2, the RIT–D proponent will develop the demand response program to commence in year 3. Project planning will commence in year 1. The RIT–D proponent expects end-users to gradually take up the demand response, which will reach a steady state in year 12. The RIT–D proponent expects it will need to consider more options for meeting the identified need in year 20. In this case, a suitable modelling period should be approximately 20 years. This is because there are approximately 20 years from the commencement of project planning until the network is in a similar state in terms of the identified need.

- AEMO;
- Interested parties;
- Non-network providers; and
- If the RIT–D proponent is a distribution business, persons registered on its industry engagement register.²⁷

When approaching stakeholder engagement, RIT–D proponents:

- Must consult with stakeholders throughout all stages of the RIT–D process. Ideally, RIT–D proponents should proactively engage with stakeholders before commencing individual RIT–Ds. For instance, these engagement activities will likely occur through developing distribution annual planning reports under NER clause 5.13.2 and using our 'demand management incentive scheme' under NER clause 6.6.3.
- Must identify the parties they must consult with and invite them to register on their industry engagement register. RIT–D proponents should have sufficient internal capabilities and processes to maintain its industry engagement register and the contact details of the above parties. The NER defines the industry engagement register as a facility by which any person can register their interest in being notified of developments relating to distribution network planning and expansion - the NER does not limit the industry engagement register to representatives of industry participants. The NER also requires distribution businesses publish an industry engagement document setting out how persons may be registered on the industry engagement register.

4.1 Consumer and non-network engagement

The NEO requires network businesses operate their networks in the long-term interests of consumers. Accordingly, network businesses should engage with their consumers so they can provide services that align more with consumers' long-term interests. While the NER is not prescriptive about consumer engagement during RIT–D application, we consider it a best practice for the RIT–D to describe in each of the three reports, how they have:

- engaged with consumers, as well as other stakeholders; and
- sought to address any relevant concerns identified as a result of that engagement.

Taking a best practice approach to consumer and non-network engagement should help RIT–T proponents:

- Identify the preferred option, by allowing a broad spectrum of credible options to be considered and by providing additional scrutiny to the analysis to ensure it is robust.

²⁶ NER, chapter 10. The NER defines Registered Participants as a person who AEMO has registered in any one or more of the categories listed in r. 2.2 to 2.7 of the NER. In the case of a person who AEMO has registered as a Trader, such a person is only a Registered Participant for the purposes referred to in r. 2.5A of the NER. However, as set out in cl. 8.2.1(a1) of the NER, for the purposes of some provisions of r. 8.2 of the NER only, AEMO, Connection Applicants, Metering Providers and Metering Data Providers who are not otherwise Registered Participants are also deemed to be Registered Participants.

²⁷ NER, cl. 5.17.4(a)(2).

- Apply the RIT–T in a way that is credible, which reduces the scope for misunderstandings and disputes, and increases the AER's ability to fast-track further regulatory assessments on expenditure related to that project.

In general, to better understand the views of consumers and other stakeholders when applying a RIT–D, proponents may wish to:

- Undertake early engagement with consumers, non-network businesses and other key stakeholders. Early engagement with stakeholders on an investment proposal can occur before a RIT–D application has formally commenced, particularly through consultation on the RIT–D proponent's annual planning report. Proactive early engagement will likely involve doing more than just fulfilling the minimum RIT–D consultation requirements in NER clause 5.17.4. However, such initiatives might minimise the effort required during the RIT–D application process. For example, early engagement might equip prospective non-network proponents to propose more suitable or effective credible options. Early consultation can also support RIT–D proponents in commencing their analysis with sound inputs and a well-framed identified need. Achieving this can facilitate a faster, smoother and less controversial RIT–D processes, reducing the scope for disputes.
- Focus on providing transparent, user-friendly data to stakeholders. We respect the need for network businesses to protect commercially sensitive information but note that the effectiveness with which alternative credible options may be proposed for a RIT–D application is maximised when stakeholders have access to all of the relevant information to appropriately contextualise an investment proposal.
- Make efforts to understand broader consumer views, recognising that the consumers who do not actively participate in consultation with RIT–D proponents can be those most affected by investment decisions. As an example, for large a RIT–D project, such efforts might include convening a consumer reference group.
- Recognise that making submissions on a RIT–D application process takes considerable time and effort on the part of consumers. We encourage RIT–D proponents to give adequate weight to the suggestions made and perspectives offered by consumers in their submissions. We also encourage RIT–D proponents to be aware of demands placed on stakeholders when there are multiple consultation processes on foot. For instance, strategies such as early engagement or being flexible to consider suggestions made outside written submissions might prove beneficial.

Our 'consumer engagement guideline for network service providers' states our expectations for how network businesses should engage with their consumers—that is, their 'end users'.²⁸ We encourage best practice consumer engagement in line with these guidelines in general, as well as when applying a RIT–D and in other aspects of network planning, such as providing information in annual planning reports.

4.2 Options screening report

²⁸ AER, *Better Regulation, Consumer Engagement Guideline for Network Service Providers*, 2013.

Clauses 5.17.4(b)-(h) of the NER outline the process that RIT-D proponents must follow in screening for non-network options or SAPS options and drafting an options screening report.

All RIT-D proponents must prepare and publish an options screening report unless they determined, on reasonable grounds, that there will not be a non-network option or a SAPS option that is a potential credible option or that forms a significant part of a potential credible option. Section 6 provides guidance and worked examples on how RIT-D proponents can determine whether this exemption applies.

A RIT-D proponent must provide the stakeholders specified in NER clause 5.17.4(a) at least three months after it publishes the options screening report to make submissions.²⁹ If the RIT-D proponent is a distribution business, it must notify persons registered on its industry engagement register when it publishes its options screening report.

When calling for submissions, RIT-D proponents should clarify that identifying additional options should predominately occur at the options screening report stage of the consultation process. RIT-D proponents should request stakeholders to support any potential credible options they propose and provide sufficient information to enable the RIT-D proponent to assess the option's technical feasibility.

Information required in an options screening report

The options screening report must include the following information:

- A description of the identified need, consistent with the guidance provided in section 3.1.
- The assumptions used in identifying the identified need. In cases of proposed reliability corrective action, this must also include reasons the RIT-D proponent considered reliability corrective action necessary.
- If available, the relevant annual deferred augmentation charge associated with the identified need.
- The technical characteristics of the identified need that a non-network option or (in relation to a SAPS enabled network) a SAPS option would be required deliver. For instance, this should include:
 - the size of load reduction or additional supply;
 - location;
 - contributions to power system security or reliability;
 - contribution to power system fault levels as determined under NER clause 4.6.1; and
 - the operation profile.
- A summary of potential credible options to address the identified need, as identified by the RIT-D proponent, including network options, non-network options, and (in relation to a SAPS enabled network) SAPS options.

²⁹ NER, cl. 5.17.4(h).

- To the extent practicable, the following information for each credible option:
 - a technical definition or characteristics of the credible option;
 - the estimated construction timetable and commissioning date (where relevant); and
 - the total indicative cost (include capital and operating costs).
- Information to assist others to present an alternative potential credible option. This should include details on how to submit a proposal for the RIT–D proponent to consider.

The RIT–D proponent must publish the options screening report in a timely manner. The options screening report must have regard to the ability of parties to identify the scope for, and develop, alternative potential credible options or variants to the potential credible options.

RIT–D proponents should pay particular attention when considering the risk, value of optionality and expenditure timing of non-network options or SAPS options. In particular, modelling, forecasts and assumptions should be consistent, open and transparent to help effectively explore non-network options.

4.3 Draft project assessment report

If a RIT–D proponent decides to proceed with the proposed distribution investment, it must prepare a draft report:

- within 12 months of:
 - the end of the consultation period on an options screening report; or
 - where an options screening report is not required, the publication of the RIT–D proponent's notice setting out its reasons for not preparing an options screening report; or
- a longer period agreed to by us in writing.

The consultation period on the draft report must be at least six weeks.³⁰ The RIT–D proponent must undertake the following when consulting on the draft report:

- Publish a request for submissions on the matters set out in its draft report, including the proposed preferred option.
- Consult directly with potentially affected customers if the proposed preferred option in the draft report has the potential to have an adverse impact on the quality of service experienced by electricity consumers. This includes anticipated changes in voluntary load curtailment by electricity consumers and anticipated changes in involuntary load shedding and customer interruptions caused by network outages.³¹

³⁰ NER, cl. 5.17.4(m).

³¹ NER, cl. 5.17.4(l).

Under NER clause 5.17.4(i)(2), we can provide a RIT–D proponent an extension to publish the draft report. When a RIT–D proponent expects it will require an extension, we recommend it submit a request to us as soon as practicable, and preferably at least six weeks from the publication date. The application for extension must include sufficient information to allow us to consider the request.

Information required for draft report

The draft report must include the following information:

- A description of the identified need for the investment, consistent with the guidance in section 3.1.
- The assumptions used in identifying the identified need. In the case of proposed reliability corrective action, this should include reasons why the RIT–D proponent considers the reliability corrective action is necessary.
- If applicable, a summary of, and commentary on, the submissions on the options screening report.
- A description of each credible option assessed.
- Where a distribution business had quantified market benefits, a quantification of each applicable market benefit of each credible option.
- A detailed description of the methodologies used in quantifying each class of cost or market benefit.
- Where relevant, the reasons why the RIT–D proponent has determined that a class or classes of market benefits or costs do not apply to a credible option.
- The results of a net present value analysis of each credible option and accompanying explanatory statements regarding the results.
- The proposed preferred option and details on its:
 - Technical characteristics. Where relevant, this should include its estimated construction timetable, estimated commissioning date, and indicative capital and operating costs.
 - A statement and accompanying analysis that the proposed preferred option satisfies the RIT–D.
 - If the proposed preferred option is for reliability corrective action and that option has a proponent, the name of the proponent.
- Contact details for a suitably qualified staff member of the RIT–D proponent that can receive queries on the draft report.

Where a RIT–D proponent has undertaken modelling, the draft report should also include a description of the assumptions used with summarised results.

While not explicitly required under the NER, we also consider it best practice to publish the following documentation along with the draft report:

- Relevant documents that show detailed modelling, inputs and assumptions used for the RIT–D assessment. RIT–D proponents should use their best endeavours to address potential confidentiality concerns that might prevent them from making data or modelling information available. For example, RIT–D proponents should explore whether they can aggregate, anonymise or redact that information, or share it with requesting parties on a confidential basis.
- Submissions received in response to the options screening report, unless marked confidential. In case of confidential submissions, a RIT–D proponent should explore making a redacted or non-controversial version public.

Exemption from preparing a draft report

Under NER clause 5.17.4(n), RIT–D proponents are exempt from providing a draft report if all these conditions occur:

- the RIT–D proponent determines under NER clause 5.17.4(c) that no non-network option or SAPS option is a credible option or forms a significant part of a credible option;
- the RIT–D proponent publishes a notice under NER clause 5.17.4(d) setting out the reasons for its determination, including any methodologies and assumptions it used; and
- the estimated capital cost to the network businesses affected by the RIT–D project of the proposed preferred option is less than the cost threshold referred to in NER clause 5.15.3(d)(3), which gets updated every three years;³²

4.4 Final project assessment report

The RIT–D proponent must consider all submissions received and publish a final report. The RIT–D proponent may discharge its obligation to publish a final report as a standalone document if NER clause 5.17.4(s) applies. In this case, the RIT–D proponent must include a final report as part of its annual planning report. Otherwise, the RIT–D proponent must publish a final report as soon as practicable:

- After the consultation period for the draft report; or
- Where a RIT–D proponent is exempt from preparing a draft report, after publishing a notice setting out reasons for no credible non-network options or SAPS options.

If a RIT–D proponent is a distribution business, it must notify persons on its industry engagement register when it publishes its final report.

While not explicitly required by the NER, we consider it best practice for a RIT–D proponent to publish the final report on its website. The RIT–D proponent may also note on its website that a process exists for resolving RIT–D disputes and provide the timeframes for lodging a dispute notice with the AER.

Information required for final report

³² From 1 January 2019 to end-December 2021, this will be \$11 million. At the time of writing, a cost threshold of \$10 million applied. See AER, *Final determination: Cost thresholds review*, November 2018, p. 14.

If a draft report was prepared, the final report must set out:

- the matters as required under NER clause 5.17.4(j); and
- only if the RIT–D proponent published a draft report, a summary of any submissions received on the draft report and the RIT–D proponent's response to each submission.³³

We consider it best practice to publish the following documentation along with the final report:

- Relevant documents that show detailed modelling, inputs and assumptions used for the RIT–D assessment. RIT–D proponents should use their best endeavours to address potential confidentiality concerns that might prevent them from making data or modelling information available. For example, RIT–D proponents should explore whether they can aggregate, anonymise or redact that information, or share it with requesting parties on a confidential basis.
- Submissions received in response to the draft report, unless marked confidential. In case of confidential submissions, the RIT–D proponent should explore whether to make a redacted or non-controversial version public.

Publishing a final report

NER clause 5.17.4(s) can exempt a RIT–D proponent from publishing a final report under NER clauses 5.17.4(o)–(p), if:

- the preferred option has an estimated capital cost to the network businesses affected by the RIT–D project of less than the cost threshold referred to in NER clause 5.15.3(d)(4), which gets updated every three years;³⁴ and
- the RIT–D proponent includes its final report as a part of its annual planning report.

4.5 Reapplication of the RIT–D

NER clause 5.17.4(t) states that if a material change in circumstances leads to, in the reasonable opinion of the RIT–D proponent, the preferred option identified in the final report no longer being the preferred option, the RIT–D proponent must re-apply the RIT–D to the RIT–D project.

A material change in circumstances may include, but is not limited to, a change in the key assumptions (such as assumptions concerning demand forecasts, major policies, plant closures, etc.) used in identifying:

- the identified need described in the final report; or
- the credible options assessed in the final report.

³³ NER, cl. 5.17.4(r).

³⁴ From 1 January 2019 to end-December 2021, this will be \$22 million. At the time of writing, a cost threshold of \$21 million applied. See AER, *Final determination: Cost thresholds review*, November 2018, p. 14.

Where appropriate, we can make a determination to exclude RIT–D proponents from this clause. In making a determination under NER clause 5.17.4(t), we must have regard to:

- the credible options (other than the preferred option) identified in the final report;
- the change in circumstances identified by the RIT–D proponent; and
- whether a failure to promptly undertake the RIT–D project is likely to materially affect the reliability and secure operating state of the distribution network, or a significant part of that network.³⁵

We expect that situations requiring a re-application of the RIT–D under NER clause 5.17.4(t) will be exceptional. Similarly, circumstances where we make a determination to exclude RIT–D proponents from this clause are likely to be exceptional. Therefore, we will consider whether such a determination would be appropriate on a case-by-case basis.

Example 20: Material change in circumstances

Material change in forecast demand

In year 0, a RIT–D proponent forecasts the following needs at a 33/11kV zone substation:

- assets deteriorating in quality will require replacement by year 2; and
- firm capacity (limited by the 33kV supply feeders) will be exceeded in year 2.

Before commencing work, the RIT–D proponent carries out a RIT–D and publishes a final report with the preferred option to replace the aged substation assets and install an additional 33kV supply feeder.

After publishing the final report, the RIT–D proponent issues a higher demand forecast in year 2 than it initially expected. In the absence of demand management or additional transformer capacity at the zone, the installation of an additional 33kV supply feeder (as per the preferred option) will not address the new forecast capacity constraint.

This is a material change in circumstances. Therefore, the RIT–D proponent is required to reapply the RIT–D.

Material change in expected costs

A RIT–D proponent has completed the RIT–D process by publishing a final report. Its preferred option is to construct a 132kV overhead line. In the process of obtaining jurisdictional approvals, significant community opposition emerges in the area. Approval for construction is contingent on undergrounding sections of the original route. This will increase the cost of the preferred option.

This is a material change in circumstances, which requires a reapplication of the RIT–D.

4.5.1 Cancellation of a RIT–D

³⁵ NER, cl. 5.17.4(u)–(v).

NER clause 5.17.4(t) describes when a RIT–D proponent must re-apply a RIT–D if a material change in circumstances means that, in the reasonable opinion of the RIT–D proponent, the preferred option identified in the final report is no longer the preferred option.

However, it is also reasonable that a material change in circumstances may lead to the identified need no longer existing, even mid-way through the RIT–D process. This may lead a RIT–D proponent to cancel its RIT–D assessment before completing the RIT–D process. For example, a RIT–D proponent may publish an options screening report, only for its customers to later advise that, due to a material change in circumstances, the identified need no longer exists.

While not explicitly required under the NER, in circumstances mentioned above, the RIT–D proponent should clearly set out reasons for cancelling its RIT–D assessment. It is also a best industry practice to keep stakeholders informed as soon as a RIT–D proponent becomes aware of the material change of circumstances around the identified need.

5 Dispute resolution

NER clause 5.17.5 sets out the process to follow in resolving RIT–D disputes.

5.1 Who can make a RIT–D dispute

The NER and the RIT–D application guidelines refer to a person or party disputing a conclusion in the final report as a disputing party. Only the following parties can lodge a dispute:

- Registered Participants;
- the Australian Energy Market Commission (AEMC);
- Connection Applicants;
- Intending Participants;
- AEMO;
- interested parties; and
- Non-network providers.³⁶

Clause 5.15.1 of the NER defines an interested party in this context as a:

...a person including an end user or its representative who, in the AER's opinion, has the potential to suffer a material and adverse National Electricity Market impact from the investment identified as the preferred option...

For the purpose of this clause, material and adverse NEM impacts include impacts on:

- a network operator or other stakeholders such as aggregators or energy service companies in the NEM that:
 - constrains the network operator's ability to fulfil functions mandated under the NER; or
 - undermines the stakeholder's ability to perform its operations to the extent that it can no longer operate or perform a particular function. This may result from physical obstruction or a substantial reduction in profitability; or
- an electricity consumer, in their role as a consumer of electricity that reduces the quality or reliability of their electricity supply below what is required under the NER or reduces the sum of consumer and producer surplus.

A stakeholder cannot be an interested party for the purposes of NER clause 5.15.1 if its potential to suffer material and adverse impact relates to an externality rather than a NEM impact (see section 3.11 for a discussion on externalities). Given this, material and adverse NEM impacts do not relate to personal detriment or personal property rights.

³⁶ NER, cl. 5.17.5(a).

The following examples demonstrate impacts relating to personal detriment and property rights to provide guidance on how we would apply NER clause 5.15.1.

Example 21: Material and adverse impacts

Impacts relating to personal detriment

A RIT–D proponent has identified a non-network option as its credible option. Part of this program will entail procuring network support services from back-up diesel generators. The RIT–D proponent expects this will defer its need for network augmentation and reduce the costs of electricity to end-users overall.

The RIT–D proponent also expects that some of its consumers will claim that the preferred option would cause detriment by increasing health-related costs due to the diesel generators increasing air pollution.

The negative impacts of this program on some consumers would constitute an impact relating to personal detriment. Therefore, we would not consider these consumers as interested parties on this basis.

Impacts relating to personal property rights

The RIT–D proponent has identified a network option as its credible option. Under this option, the RIT–D proponent will build poles and wires. This network infrastructure will run through several properties. Some of the property owners consider that this action will devalue their property.

This would constitute an impact relating to personal property rights. Therefore, we would not consider these property owners as interested parties.

5.2 What can be disputed

The disputing party may only dispute conclusions made by the RIT–D proponent in the final report on the following grounds:

- the RIT–D proponent has not applied the RIT–D in accordance with the NER; or
- the RIT–D proponent preformed a manifest calculation error in applying the RIT–D.³⁷

Disputing parties cannot dispute issues in the final report that:³⁸

- the RIT–D treats as externalities (section 3.11 discusses externalities in more detail); or
- relate to an individual's personal detriment or property rights.

5.3 Lodging a dispute and information required

Within 30 days of the RIT–D proponent publishing the final report, the disputing party must:

³⁷ NER, cl. 5.17.5(a)(1) and (2).

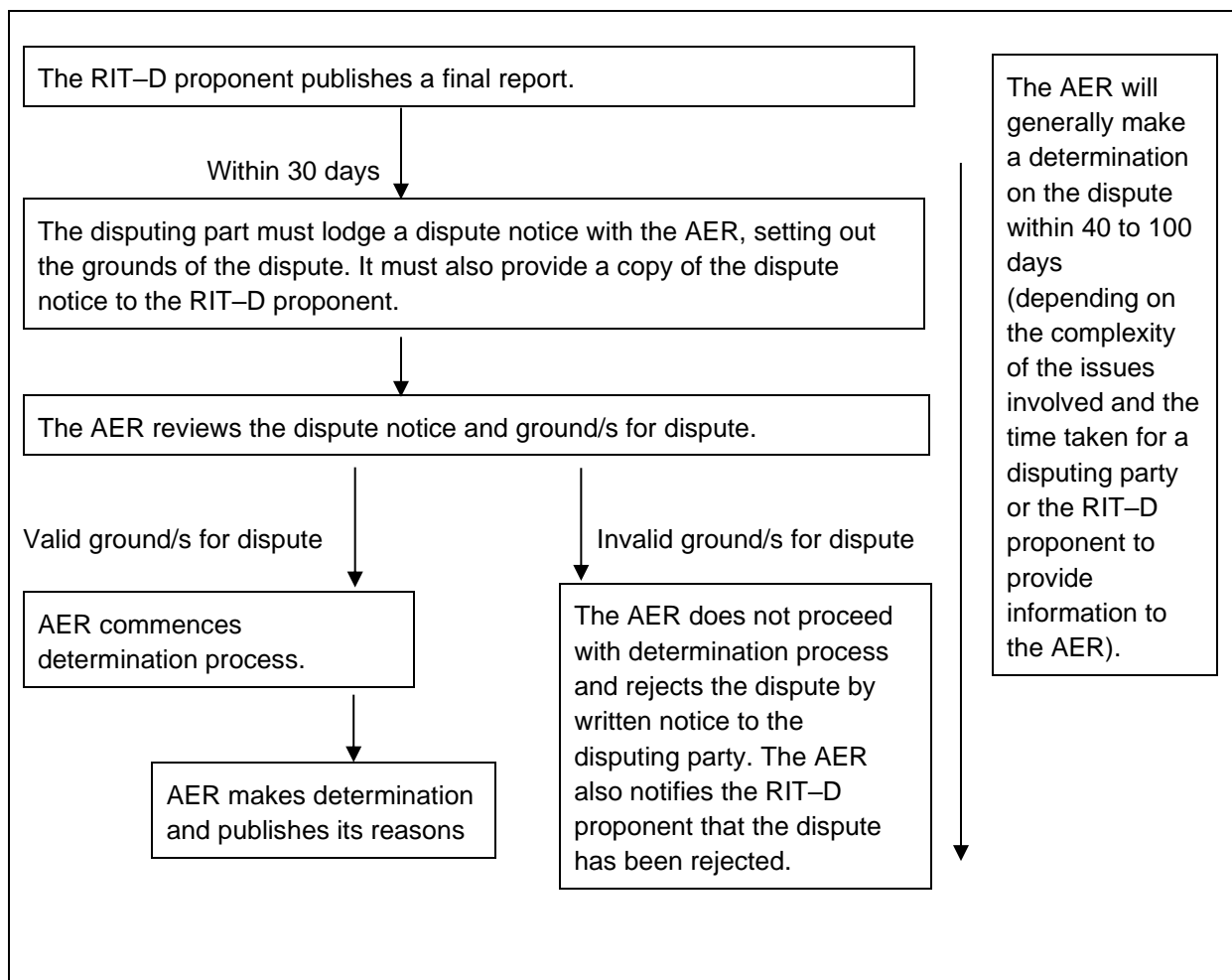
³⁸ NER, cl. 5.17.5(b)(1) and (2).

- give us the notice of the dispute in writing setting out the grounds for the dispute (the dispute notice); and
- provide a copy of the dispute notice to the relevant RIT–D proponent.³⁹

The dispute notice should include the following information:

- the disputing party’s name, a contact officer, address, email and telephone number;
- the ground/s for the dispute;
- any submissions the disputing party made regarding the RIT–D proponent’s options screening report, the draft report and the final report (if applicable);
- the RIT–D proponent's response to any submissions made by the disputing party regarding the draft report (if applicable);
- details of meetings between the RIT–D proponent and disputing party (if applicable); and
- the details of any other known parties involved in the matter.

Figure 2: Dispute Resolution Process



³⁹ NER, cl. 5.17.5(c).

5.4 Procedure for a dispute

All parties have different obligations under NER clause 5.17.5 to ensure the timely resolution of disputes. Figure 2 summarises the process for resolving RIT–D disputes.

Timeframe for resolving disputes

We must decide whether a dispute is valid within:

- 40 days of receiving the dispute notice; or
- an additional period of up to 60 days where we notify a relevant party that additional time is required to make a determination because of the complexity or difficulty of the issues involved.⁴⁰

AER determination

After considering the dispute notice and any other relevant information, we must either reject the dispute or make and publish a determination. We only require the RIT–D proponent to amend its final report if we determine that it applied the RIT–D incorrectly or there was a manifest error in its calculations when applying the RIT–D.

If we decide to reject the dispute, we must do the following:

- reject the dispute by written notice to the disputing party if we consider that the grounds for the dispute were misconceived or lacking in substance; and
- notify the RIT–D proponent that the dispute has been rejected.⁴¹

If we do not reject the dispute, we must make and publish a determination that:

- directs the RIT–D proponent to amend the matters set out in the final report; or
- states that, based on the grounds of the dispute, the RIT–D proponent will not need to amend the final report.⁴²

Material and advice the AER may consider

We may engage an expert to provide advice on specific matters. The experts may include engineers, economists or other experts in the electricity industry. It is likely that an engineering expert would be needed to advise us on the engineering/planning aspects where the identified need is for reliability corrective action. Given the complex economic modelling and analysis required, we may also require an economic expert to assist in resolving disputes regarding the quantification of market benefits.

On the information we will consider in making a determination on the dispute, we:

⁴⁰ NER, cl. 5.17.5(d).

⁴¹ NER, cl. 5.17.5(d)(1) and (2).

⁴² NER, cl. 5.17.5(d)(3).

- must only take into account information and analysis that the RIT–D proponent could reasonably be expected to have considered or undertaken at the time it performed the RIT–D;
- must publish our reasons for making the determination;
- may disregard any matter raised by the disputing party or the RIT–D proponent that is misconceived or lacking in substance; and
- must specify a reasonable timeframe for the RIT–D proponent to comply with our direction to amend the matters set out in the final report.⁴³

We are likely to consider the following material:

- the dispute notice;
- the options screening report, the draft report, and the final report (as applicable);
- any expert advice or reports on the proposed preferred option;
- the RIT–D proponent's annual planning reports and any other relevant planning publications;
- relevant planning criteria, reliability requirements or jurisdictional licensing requirements; and
- relevant regulatory decisions relating to the proposed preferred option.

Requests for further information

Under NER clause 5.17.5(h), we may request additional information regarding the dispute from the disputing party and/or the RIT–D proponent. The disputing party or the RIT–D proponent (as the case may be) must provide any additional information as soon as reasonably practicable.

A request for additional information will be in writing. The notice will explain that the:

- request is being made under NER clause 5.17.5(h);
- period of time for making a determination is automatically extended by the amount of time it takes the relevant party to provide the requested information, provided that:
 - we make the request for additional information at least seven days prior to the expiry of the relevant period; and
 - the RIT–D proponent or disputing party provides the information within 14 days of receipt of the request.

While the NER expressly provides for us to request information from the RIT–D proponent or the disputing party, we can request information from a party that is external to a dispute.

We may ask third parties to provide information voluntarily. We can also issue a notice under section 28 of the National Electricity Law.

⁴³ NER, cl. 5.17.5(f).

6 Clause 5.17.4(c) determinations

The RIT–D application guidelines must provide guidance on how to make a determination under NER clause 5.17.4(c). Clause 5.17.4(c) states that a RIT–D proponent need not prepare an options screening report if it determines, on reasonable grounds, that there will not be a non-network option or a SAPS option that is a potential credible option or that forms a significant part of a potential credible option to address the identified need.

6.1 Screening for non-network options and SAPS options

Before RIT–D proponents can make a determination under NER clause 5.17.4(c), they must screen for non-network options and SAPS options. In this context, screening means that RIT–D proponents must consider all feasible non-network options and SAPS options, such as:

- Any measure or program targeted at reducing peak demand, including:
 - Applying automatic control schemes, such as direct load control.
 - Applying broad-based demand management programs, such as energy efficiency measures;
 - Entering demand response arrangements with customers, which will often include procuring network support services from demand aggregators.
- Increased local or distributed generation/supply options, including:
 - Capacity for standby power from existing or new embedded generators.
 - Using energy storage systems, load transfer capacity and more.

6.2 Assessing non-network options as potential credible options

Once a RIT–D proponent screens for non-network options, it can determine whether any of these non-network options could individually or jointly, with other option/s constitute a credible option.

A credible option may combine various measures to form one integrated solution to an identified need. Therefore, a RIT–D proponent must consider treating a package of different non-network options as one credible option when determining whether a non-network option could constitute part of a credible option. A RIT–D proponent must also determine whether any non-network options could combine with a network or generation option to form a significant part of a credible option. Non-network options could form a significant part of a credible option to address the identified need where:

- Adding a non-network option to a network option or a generation option could form an integrated solution to address an identified need, such as increasing the net economic benefits in the NEM.

- The network option is not a feasible credible option, unless the RIT–D proponent combines it with a non-network option.

When making this determination, a RIT–D proponent should assess whether the option or group of options:

- would potentially address the identified need;
- would be commercially and technically feasible⁴⁴; and
- could be implemented in a sufficient time to meet the identified need.

A RIT–D proponent must state its reasoning if it determines that no non-network options satisfy these criteria.

Example 22: A non-network option as a significant part of a credible option

The identified need is to meet an expected 20 per cent increase in distribution network demand, thereby increasing market benefits by reducing involuntary load shedding. The RIT–D proponent has identified two credible options:

- Option 1: Install larger capacity feeders that will increase capacity in the distribution network by 40 per cent.
- Option 2: Introduce a demand management program to reduce peak load, increasing available network capacity by 10 per cent. The RIT–D proponent will then install smaller, less-costly feeders so that total capacity will increase by 20 per cent.

Both options 1 and 2 are credible in that they can address the identified need and are commercially and technically feasible. Both can be implemented in sufficient time to meet the identified need.

Consequently, the RIT–D proponent cannot make a determination under NER clause 5.17.4(c).

6.3 Publishing a clause 5.17.4(d) notice

If a RIT–D proponent makes a determination under NER clause 5.17.4(c), it must publish a notice under NER clause 5.17.4(d) (the 'Notice'), which states:

If a RIT–D proponent makes a determination under paragraph (c), then as soon as possible after making the determination it must publish a notice setting out the reasons for its determination, including any methodologies and assumptions it used in making its determination.

The Notice must include methodologies and assumptions used, and provide reasons why no non-network option or SAPS option could:

⁴⁴ As discussed in 3.2.2, an option is commercially and technically feasible where its estimated costs are comparable to (or less than) other credible options that address the identified need. One exception includes where the credible option is likely to deliver materially higher market benefits. In such circumstances, the option may be commercially feasible despite the higher expected cost.

- address the identified need;
- be commercially feasible;
- be technically feasible;
- be implemented in a sufficient time to meet the identified need; nor
- satisfy all of the above requirements when forming a significant part of a credible option.

We require RIT–D proponents to apply this level of consideration to every non-network option and/or SAPS option available.

A RIT–D proponent only needs to describe one reason why a non-network option or SAPS option is not a credible option. For instance, if a non-network option does not address the identified need and is not technically feasible, the RIT–D proponent is only required to show that it does not address the identified need or that it is technically not feasible. This does not preclude a RIT–D proponent from showing why the option fails to satisfy both these requirements. To minimise the chance of potential disputes, a RIT–D proponent may find it prudent to explain the reasons the option fails both requirements.

A Valuing specific classes of market benefits

Under NER clause 5.17.2(c)(5), the RIT–D application guidelines must provide guidance and worked examples on the acceptable methodologies for valuing the market benefits of a credible option. In this appendix, we provide guidance and worked examples on valuing the following classes of market benefits:

- changes in voluntary load curtailment;
- involuntary load shedding;
- changes in costs to other parties;
- differences in the timing of distribution investment;
- changes in load transfer capacity and the ability of embedded generators to take up load;
- additional option value; and
- changes in electrical energy losses.

A.1 Voluntary load curtailment

A credible option may change the amount of voluntary load curtailment. For example, a demand side option may increase voluntary load curtailment. This would be a negative contribution to the market benefits of the credible option, calculated as:

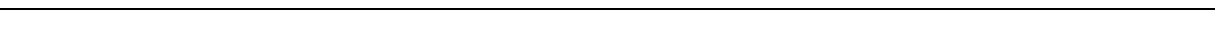
- the quantity (in MWh) of voluntary load curtailment from the credible option; multiplied by
- consumers' willingness to pay (or be paid) (in \$/MWh) for the electricity that is voluntarily curtailed due to the credible option.

The less consumers need to be paid to voluntarily curtail their electricity use, the lower the negative market benefits from a voluntary curtailment option. This is because, in a competitive market, the payment consumers must receive to voluntarily curtail their power should reflect, at a minimum, their real loss of utility from not consuming power.

However, the negative contribution to market benefits of a demand side option should be more than offset by a positive contribution to market benefit caused by a reduction in the involuntary load shedding that would otherwise occur. This is set out in example 23 below.

RIT–D proponents would derive the net contribution to market benefits of a demand side option as the value of unserved energy to consumers generally less the value of that energy to those consumers who have voluntarily agreed to consume less due to the demand side option. For example, a demand side option might lead to voluntary load curtailment of 10 MWh of electricity, valued by consumers at \$30/MWh. This might prevent involuntary load shedding of 10 MWh of electricity, valued at \$30,000/MWh. This would yield a positive contribution to market benefits of $(\$30,000 - \$30) * 10 = \$299,700$.

Example 23: Increased voluntary and decreased involuntary load curtailment



Assume that load is 201 MW. Remote coal-fired generation has a fuel cost of \$10/MWh and capacity of 250 MW. The capacity of the network between the remote generator and the load is limited to 200 MW. If demand exceeds supply, load is involuntarily curtailed. Customers value involuntarily curtailed energy at \$30,000/MWh.

The credible option is a demand side option where commercial customers agree with a retailer to reduce power demand by 1 MW when requested by the retailer. This will occur when the retailer expects the spot price to exceed \$1,000/MWh in the absence of load curtailment. The \$1,000/MWh price reflects the retailer's view of its commercial customers' likely willingness to accept being voluntarily curtailed.

In the base case:

- Demand outstrips supply by $201 \text{ MW} - 200 \text{ MW} = 1 \text{ MW}$.
- Price is set at the value customers place on involuntarily curtailed load (\$30,000/MWh) and 1 MW of load is involuntarily curtailed to ensure demand = supply.
- Value of voluntary load curtailment = $0 \text{ MW} * \$1,000 = \0 per hour.
- Value of involuntary load curtailment = $1 \text{ MW} * \$30,000 = \$30,000$ per hour.

In the state of the world with the credible option:

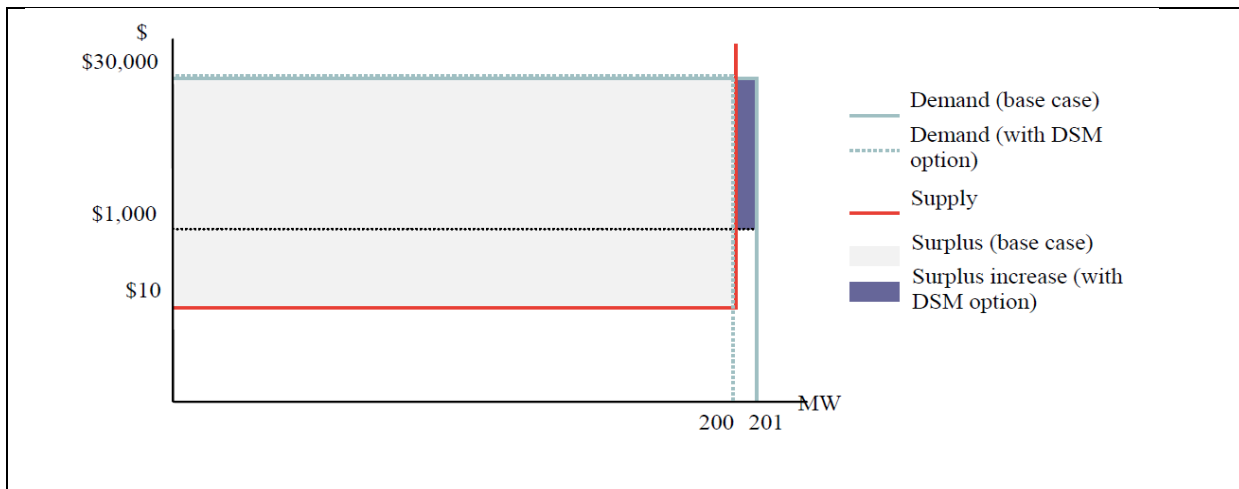
- Demand = load – voluntary load curtailment = $201 \text{ MW} - 1 \text{ MW} = 200 \text{ MW}$.
- The remote generator sets the price at \$10/MWh.
- Voluntary load curtailment is 1 MW and at a price of \$10/MWh.
- Demand = supply and there is no load shedding.
- Value of voluntary load curtailment = $1 \text{ MW} * \$1,000 = \$1,000$ per hour.

The market benefits of the credible option arise from the demand side option through:

- decreased involuntary load curtailment = $\$30,000 - \$0 = \$30,000$; less
- increased voluntary load curtailment = $\$1,000 - \$0 = \$1,000$.

The combined contribution to the market benefits of the credible option (in terms of increased voluntary and decreased involuntary load curtailment) is \$29,000 per hour. Assuming the same conditions over 10 hours in a year, the total contribution to the market benefits of the credible option would be $10 * \$29,000 = \$290,000$ per annum. This is set out in figure 3 below.

Figure 3: Increased voluntary and decreased involuntary load curtailment



A credible option may reduce voluntary load curtailment. For example, a RIT–D proponent may have a pre-established program where it pays large customers to reduce their energy usage during times of peak demand. For instance, this may entail paying energy-intensive factories to shut down temporarily. If a RIT–D project (for example, augmenting the distribution network) decreases reliance on the programs, then it would represent a reduction in voluntary load curtailment.

A.2 Involuntary load shedding and customer interruptions

A credible option may reduce involuntary load shedding. This may occur if the credible option is a:

- local generation option that supplies electricity;
- demand side reduction option that leads to voluntary load curtailment and thereby reduces demand for electricity;
- control scheme that helps prevent overloads on the network; or
- network option that enables electricity to be plentiful at times that involuntary load shedding would otherwise need to occur. Network options could achieve this by:
 - transporting electricity from a location where it is relatively plentiful to where it is relatively scarce; or
 - improving infrastructure so that less energy is lost in distribution or so that infrastructure is more resilient to external interferences.

A RIT–D proponent can value the market benefit of reduced involuntary load shedding as:

- the quantity (in MWh) of involuntary load shedding not required due to the credible option; multiplied by
- a reasonable forecast of the value of electricity to consumers (in \$/MWh) not shed due to the credible option (see section 3.4.3 on VCR).

A negative contribution from providing the credible option would partially offset this positive contribution to market benefits. For example, a local generation option may reduce involuntary load shedding but will increase the use of fuel to supply electricity.

It is worth noting that a credible option may also lead to involuntary load curtailment in some circumstances. For instance, a credible option might require outages of existing network infrastructure during construction. As above, we would expect this negative contribution would be largely offset by larger positive contributions, such as reduced involuntary load curtailment post-construction.

Example 24: Decreased involuntary load shedding

Load is 201 MW. Remote coal-fired generation has a fuel cost of \$10/MWh and capacity of 250 MW. The capacity of the network between the remote generator and the load is limited to 200 MW. Customers' value of involuntarily curtailed energy is \$30,000/MWh.

The credible option is to build a 25 MW local gas-fired generator with a fuel cost of \$100/MWh. In the base case:

- Demand outstrips supply by $201 \text{ MW} - 200 \text{ MW} = 1 \text{ MW}$.
- The value customers place on involuntarily curtailed energy is \$30,000/MWh.
- Value of fuel consumed = $200 \text{ MW} * \$10 = \$2,000$ per hour.
- Value of involuntarily curtailed load = $1 \text{ MW} * \$30,000 = \$30,000$ per hour.

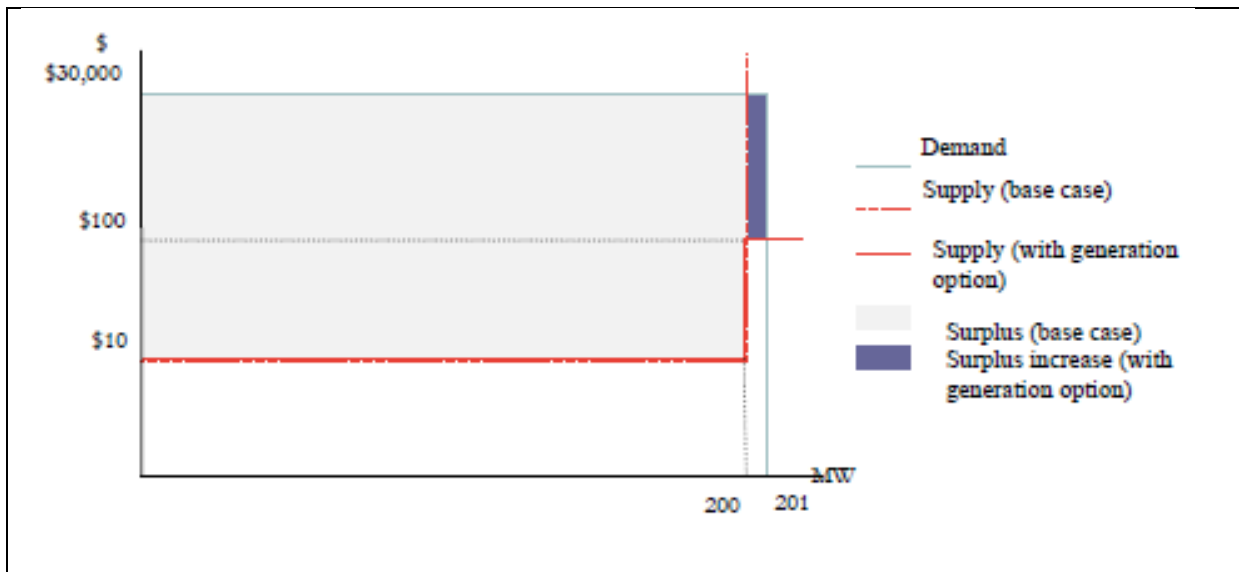
In the state of the world with the credible option:

- Output of remote generator = 200 MW and output of local generator = 1 MW.
- The local gas-fired generator has a fuel cost of \$100/MWh.
- Value of fuel consumed = $200 \text{ MW} * \$10 + 1 \text{ MW} * \$100 = \$2,100$ per hour.
- Demand = supply and there is no load shedding.

The contribution to the market benefits of the credible option from reduced involuntary load curtailment is $\$30,000 - \$0 = \$30,000$. This would be partly offset by the cost of increased fuel consumption needed to generate electricity, which is $\$2,100 - \$2,000 = \$100$ per hour.

The net contribution to the market benefits of the credible option (in terms of decreased involuntary load curtailment and increased fuel consumption) is therefore \$29,900 per hour. Assuming the same conditions over 10 hours in a year, the total contribution to the market benefits of the credible option is $10 * \$29,900 = \$299,000$ per annum. This is set out in figure 4 below.

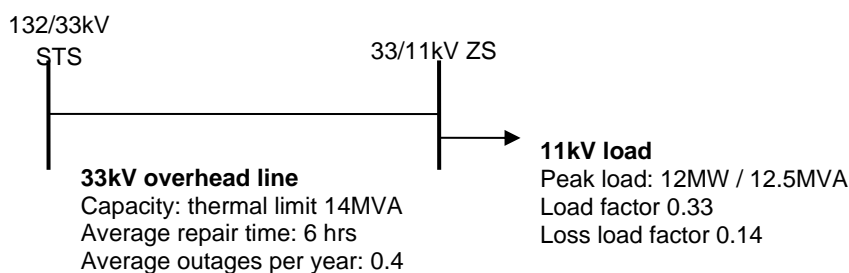
Figure 4: Decrease involuntary load shedding



Example 25: Reliability improvement in a radial system

A long 33kV overhead line from a 132/33kV sub transmission substation radially supplies a rural 33/11kV zone substation. Figure 5 shows the parameters of the system.

Figure 5: Existing supply arrangement



The thermal capacity of the 33kV line limits the substation capacity. Due to an emerging capacity constraint at the zone substation, the RIT–D proponent proposes to replace the existing line with a 33kV dual circuit overhead tower line. As well as addressing the capacity constraint, this option will result in higher customer reliability.

Assume:

- The period of risk is the average repair time after an outage = 6 hours.
- VCR is \$50,000 per MWh.

Under the existing supply arrangement, for an outage on the 33kV line, the:

- Load at risk is the average load at the zone substation is (peak demand MW) * (load factor) = 12MW * 0.33 = 4 MW.
- Probability of an outage in a year is (number of elements) * (element outage rate per year) * (hours at risk in year / 8,760) = 1 * 0.4 * (8,760 hours / 8,760h hours) = 0.4.

- Energy at risk is (load at risk) * (period of risk) * (probability of outage) = 4 MW * 6h * 0.4 = 9.6 MWh.
- Value of risk in the first year is 9.6 MWh*\$50,000/MWh = \$480,000.

Under the credible option (replacing the existing 33kV line with a dual circuit 33kV line), the risk of a dual outage on both circuits is assumed to be small enough to be set to zero, so the value at risk is zero.

The contribution to market benefits of the credible option due to the reliability improvement (in the first year) is \$400,000 – \$0 = \$400,000.

As discussed above, a demand side option may have a negative contribution to market benefits from increasing voluntary load curtailment, whilst also contributing positively by decreasing involuntary load shedding. In these cases, the net effect on market benefits would likely be positive, as electricity will usually be worth more to those that are involuntarily curtailed than to those voluntarily curtailed, see example 24.

A.3 Costs to other parties

Other parties may experience costs from differences in the timing of new plant, capital costs, as well as operating and maintenance costs. These costs capture the impact of a credible option on the plant expansion path of the market.

To the extent that a credible option delays the commissioning of a new plant (which reduces the present value of the resource costs incurred to meet demand), or reduces other parties' costs, this represents a positive market benefit of the option. The reverse may also apply.

Credible options that delay the need for investment in the distribution network could potentially have a similar impact on the need for investment in the transmission network. These are likely to include options aimed at managing load when and where there are network constraints. Such credible options may constitute demand management programs and the use of embedded generation and energy storage. This is set out in example 26 below.

Example 26: Delaying network augmentation

The credible option is a program aimed at managing peak demand. As well as delaying the need to augment the distribution network, it will delay the need to augment the transmission network by 3 years. Without the demand management program, the transmission network would need to be augmented immediately (t=0). The augmentation of the transmission network has a capital cost of \$200 million. The discount rate is 7 per cent.

Based on the above assumptions, the positive contribution to the market benefits of the demand management program option to the delayed investment in the transmission network (in terms of delaying capital costs only) can be calculated as:

- The present value (PV) of the capital costs in the transmission augmentation in the base

$$\text{case: } PV = \frac{\$200 \text{ million}}{(1.07)^9} = \$200 \text{ million}; \text{ less}$$

- The PV of the capital costs in the transmission augmentation with the credible option:

$$PV = \frac{\$200 \text{ million}}{(1.07)^3} = \$163 \text{ million}$$

The positive contribution to the market benefits of the credible option due to the delayed investment in the transmission network is \$200 million – \$163 million = \$37 million.

A.4 Timing of expenditure

A credible option may change the timing (or the configuration) of other future investments to be made by or for the RIT–D proponent.

When considering changes in timing, the RIT–D proponent should only take into account distribution investments to address different identified needs to that of the credible option. It is not clear whether or how many investments this category would include. This is set out in example 27 below.

Example 27: Changes in timing of expenditure

A RIT–D proponent has forecast that in 9 years, it will need to replace a considerable portion of the plant in one of its substations as a cost of \$15 million. The current discount rate is 9 per cent.

Meanwhile, the RIT–D proponent is considering a non-network option to meet an identified need for reliability corrective action. This will involve an integrated solution where it will combine direct load control, demand response and the connection of an embedded generator.

The RIT–D proponent has forecast that the integrated solution will decrease peak demand by 15 per cent by year 5, and 20 per cent by year 10. The RIT–D proponent has estimated that this will also alleviate stress on the network and will delay the need to replace the plant in its substation by 1 year.

The RIT–D proponent could calculate market benefits of the credible option delaying the investment in the substation as the difference between the PV of replacement costs:

- In year 9 as a part of its base case:

$$PV = \frac{\$15 \text{ million}}{(1.09)^9} = \$6,906,417$$

- In year 10 as the state of the world with the credible option in place:

$$PV = \frac{\$15 \text{ million}}{(1.09)^{10}} = \$6,336,162$$

The positive contribution to the market benefits of the credible option due to the delayed investment in the substation decreases PV costs: \$6,906,417 – \$6,336,162 = \$570,255.

A.5 Load transfer capacity and embedded generators

Clause 5.10.2 of the NER defines load transfer capacity as:

meeting the *load* requirements for a *connection point* by the reduction of *load* or group of loads at the *connection point* and increasing the *load* or group of *loads* at a different *connection point*.

RIT–D proponents can improve load transfer capacity where a credible option allows end users to gain access to a back-up the power supply. This is a market benefit as backed-up power supplies can service end-users in the event of a power failure.

RIT–D proponents could count improved capacity for embedded generators to take up load as a market benefit for the same reason. Namely, where embedded generation can reliably take up load, it can contribute to the security of supply by supplementing the power available from the network. Consequently, in the event of a supply failure, RIT–D proponents can use protective equipment to 'island' the embedded generation and part of the affected network to retain supply to that a part of the affected load.

A RIT–D proponent could effectively treat market benefits gained from increased load transfer capability and/or the ability of embedded generators to take up load as it would for changes in involuntary load shedding.

A.6 Electrical energy losses

A credible option may lead to a net increase or decrease in network losses. An increase in network losses negatively contributes to the market benefits of a credible option, while a decrease in network losses positively contributes to the market benefits of a credible option.

Most electricity losses occur in the distribution network and may be minimised through:

- power lines being built to connect large consumers more directly;
- improving the efficiency of distribution transformers, or, where possible, reducing the number of transformation steps;
- reducing the average utilisation rate of distribution network cables, since higher loads on power lines result in higher variable losses;
- using power lines and cables with wider cross-sections;
- installing distributed generations systems for energy to be consumed locally or in densely populated areas;
- systems for optimising energy delivery efficiency on distribution systems; and
- power factor correction.

Example 28: Decreased electrical energy losses

Load at region B in a distribution network is 100 MW. Energy costs after generation are \$12/MWh and capacity on the distribution network is 120 MW.

The credible option is the augmentation of the distribution network at region B. This will entail installing more distribution network cables. The RIT–D proponent expects the augmentation to reduce distribution losses from 20 to 5 per cent when operating at 100 MW.

In the base case:

- Price = \$12/MWh.
- Total losses = $\$12 \times 0.2 \times 100 \text{ MW} = \240 per hour.

In the state of the world with the credible option:

- Price = \$12/MWh.
- Total losses = $\$12 \times 0.05 \times 100 \text{ MW} = \60 per hour.

Assuming the same conditions prevail over 8,760 hours per year, the contribution of decreased network losses to the market benefit of the credible option is $(\$240 - 60) \times 8,760 = \$1,576,800$ per year.

Example 29: Energy loss reduction in a radial system

Under the supply arrangement set out in example 25, the network loss at the time of peak demand is 1.5 MW. After the construction of the dual circuit line, as per the credible option, this falls to 0.3 MW.

Annual losses are;

- Under the existing supply arrangement: (network loss at peak demand) * 8,760 hours * (loss load factor) = $1.5 \text{ MW} \times 8,760 \text{ hours} \times 0.14 = 1,840 \text{ MWh}$.
- Under the credible option: (network loss at peak demand) * 8,760 hours * (loss load factor) = $0.3 \text{ MW} \times 8,760 \text{ hours} \times 0.14 = 368 \text{ MWh}$.

The annual loss reduction under the credible option is $1,840 \text{ MWh} - 368 \text{ MWh} = 1,472 \text{ MWh}$. Assuming the value of losses is \$35 per MWh, the contribution of the decreased network losses to the market benefit of the credible option is $1,472 \text{ MWh} \times \$35/\text{MWh} = \$51,520$ in the first year.

A.7 Option value

Clause 5.17.1(c)(4)(vi) of the NER requires RIT–D proponents to consider option value as a class of potential market benefits where it had not already been included in other classes of market benefits. Option value refers to a benefit that results from retaining flexibility where certain actions are irreversible (sunk), and new information may arise in the future as a payoff from taking a certain action. Option value is likely to arise where there is uncertainty regarding future outcomes, the information that is available in the future is likely to change,

and credible options are sufficiently flexible to respond to that change. For example, option value might be realised through credible options that 'build-in' the option to:

- Expand at minimal cost in response to upside demand risk, such as by building in excess capacity. This action will likely have option value where there are economies of scale and demand is likely to be higher than expected.
- An option to withdraw or reduce the scope in response to downside demand risk, such as by selecting smaller, scalable investments such as network support agreements. This action will likely have option value where investments are irreversible and demand is likely to be lower than expected.

In our view, if a RIT–D proponent performs scenario analysis in accordance with these RIT–D application guidelines, then its RIT–D analysis should effectively capture any option value as a class of market benefit. We provide more guidance on scenario analysis and option value in sections 3.3 and 3.7–3.10. We also provide the worked example below, which extends from example 13 and example 14 earlier on in these RIT–D application guidelines.

Example 30: Flexibility and option value

This example extends from example 13 and example 14. Example 13 described three credible options: a network option, a distributed generation option and a demand-response option. It compared the merits of these options across four reasonable scenarios reflecting the potential combinations of future plant capital cost (high or low) and future demand growth (high or low). To simplify this example, assume that plant capital costs are certain to be low and the only uncertainty is demand growth, which may be high or low with equal probability (50% each).

Example 13 assumed that the size of each credible option was fixed and irreversible at the time of the investment decision. There was no scope to either expand or fully or partially reverse the option in the future once the RIT–D proponent knew whether actual demand growth was high or low. This example relaxes that restriction.

Example 13 implicitly incorporated two time periods:

- Present – reflecting the time of the investment decision and commissioning date (hereinafter referred to as T_P); and
- Future – reflecting the time at which (hereinafter referred to as T_F):
 - The identity of the true reasonable scenarios becomes apparent. That is, when it becomes known whether future demand growth is high or low); and
 - The time at which the market benefits of the credible option come to fruition.

Figure 6: Example 13 time periods

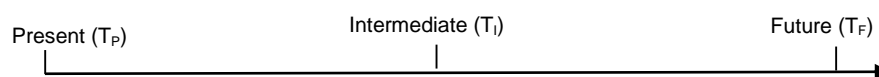


This example distinguishes between the times when the identity of the true reasonable scenarios becomes apparent from when the market benefits of the credible option come to

fruition. Assume the RIT–D proponent can make a follow-up decision (after its initial investment decision) when it knows whether future demand will be high or low (T_I), but before the market benefits of any credible option arise (at T_F).

- Therefore, this example incorporates three time periods:
- Present (T_P)
- Intermediate (T_I)
- Future (T_F)

Figure 7: Revised time periods



The ability of the RIT–D proponent to make a follow-up investment decision at T_I when future demand growth is known but has not yet occurred opens up the possibility for it to:

- Develop a small-scale initial option at T_P ; and
- If demand turns out to be high, expand or supplement that option at T_I in time to meet the higher demand at T_F .

In this way, the RIT–D proponent can more efficiently select its initial investment to reduce the risk of unnecessary (or insufficient) expenditure.

Given the opportunity to make a follow-up investment decision at T_I , the RIT–D proponent can undertake an option sufficient to cater for all future demand scenarios, including where there is high demand growth. Alternatively, the RIT–D proponent can undertake a smaller and cheaper option that it can expand if required. This smaller option would be sufficient if future demand growth turned out to be low. However, it would prove to be insufficient, requiring a subsequent upgrade or supplementary investment if demand growth turned out to be high.

To specify each credible option, the RIT–D proponent must specify (a) what action it will take in the short-term at T_P ; and (b) in the event that demand turns out to be high at T_I , what further action it will take in advance of T_F . This example assumes any supplementary investment would be a network option or upgrade.

Under these assumptions, the RIT–D proponent estimates the following six credible options:

1. A full-scale network option that satisfies the high-growth scenario, as in example 13.
2. A full-scale distributed generation option that satisfies the high-growth scenario, as in example 13.
3. A full-scale demand-side option that satisfies the high-growth scenario, as in example 13.
4. A small-scale network option that satisfies the low-growth scenario and is upgradable to the level of the full-scale network option should demand turn out to be high. The RIT–D proponent assumes:

- In the low-growth scenario, the benefits of the small-scale and full-scale network options are identical.
 - In the high-growth scenario, the benefits of the small-scale and full-scale network options are identical, because the RIT–D proponent upgrades the small-scale network option to the full-scale network option at T_I in time to meet the higher demand at T_F .
 - In the low-growth scenario, the costs of the small-scale network option are two-thirds of the costs of the full-scale network option, reflecting the loss of economies of scale involved in network development as well as the costs of building-in upgradeability to the small-scale network option.
 - The costs of initially developing the small-scale network option and subsequently upgrading to the full-scale network option at T_I are \$5 million greater than the costs of developing the full-scale network option from the outset (at T_P). This reflects the loss of economies of scale and duplication involved in developing a full-scale network option in two stages.
5. A smaller-scale distributed generation option coupled with the ability to undertake a small-scale network option later should demand growth turn out to be high. The RIT–D proponent assumes: In the low-growth scenario, the benefits of the smaller-scale distributed generation option and the full-scale distributed generation option are identical.
- In the high-growth scenario, the RIT–D proponent develops the small-scale network option at T_I , in time to meet the higher demand at T_F . The benefits of the smaller-scale distributed generation option combined with the small-scale network option in the high-growth scenario are \$2.5 million lower than the benefits of the full-scale network option.
 - The costs of the smaller-scale distributed generation option are two-thirds the cost of full-scale distributed generation option, reflecting the loss of economies of scale involved in generation development.
 - The costs of developing the small-scale network option at T_I should demand growth turn out to be high are two-thirds the cost of the full-scale network option due to the loss of economies of scale.
6. A smaller-scale demand-side option coupled with the ability to carry out a subsequent small-scale network option should demand turn out to be high. The RIT–D proponent assumes:
- In the low-growth scenario, the benefits of the smaller-scale and full-scale demand-side options are identical.
 - In the high-growth scenario, the RIT–D proponent will develop the smaller-scale network option at T_I , in time to meet the higher demand at T_F . The benefits of the smaller-scale demand-side option combined with the small-scale network option in the high-growth scenario are \$20.5 million less than the benefits of the full-scale network option.
 - The costs of the smaller-scale demand-side option are two-thirds the cost of the

full-scale demand-side option, reflecting the loss of economies of scale involved in arranging demand-side response.

- The costs of developing the small-scale network option at T_I should demand growth turn out to be high are two-thirds the cost of the full-scale network option due to the loss of economies of scale.

For each of these six credible options, there are two reasonable scenarios to consider—a low demand growth scenario and a high demand growth scenario, each potentially with its own market development path. As noted above, a probability of 50 per cent is attributed to each demand growth scenario.

The 'tree' diagram in figure 8 can represent the RIT–D proponent's choices when making an investment decision at T_P without knowing how quickly demand will grow in the longer term. At T_P , the RIT–D proponent can invest in a large option or a small option. The RIT–D proponent will know the rate of growth at T_I , when it will make a supplementary investment if it initially invested in a small option and demand growth appears to be high. It will commission that supplementary investment so it can serve customers by the time the higher demand manifests at T_F .

The tree diagram in figure 8 is a stylised representation of a subset of the choices that could be available to RIT–D proponents. The tree diagram and the analysis will become more complex the more times the RIT–D proponent receives information that it act on it by expanding, supplementing or winding back or down a project. This is because the analysis will need to be to capture all the potential option values.

In this example, the unweighted and weighted market benefits and costs of each of these credible options in each reasonable scenario are set out in table 7 below. In this case, the preferred option is option 6 – the smaller-scale demand-side option coupled with the ability to carry out a subsequent small-scale network option should demand turn out to be high.

Figure 8: Tree diagram for Example 30

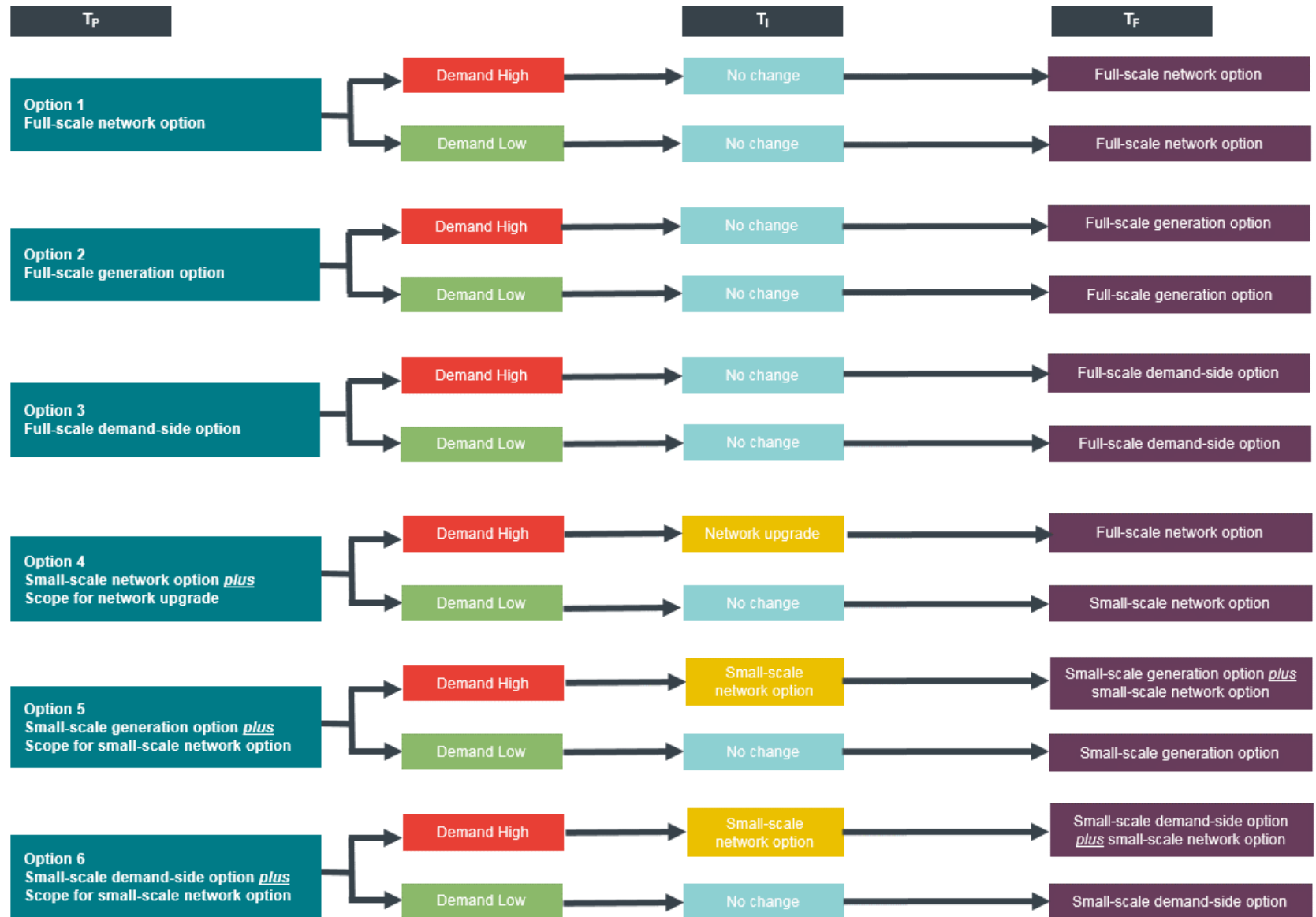


Table 7: Net benefit calculation for Example 30

Option	Description	Relative market benefits high demand	Relative market benefits low demand	Weighted-average relative market benefits	Relative costs high demand	Relative costs low demand	Weighted-average relative costs	Net economic benefit	Rank
1	Full-scale network option (the 'base case' for the purposes of this reliability-driven RIT-D)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3
2	Full-scale distributed generation option	-5.0	7.0	1.0	0.7	0.7	0.7	0.4	2
3	Full-scale demand-side option	-35.0	4.0	-15.5	-11.2	-11.2	-11.2	-4.3	6
4	Small-scale network option with scope for network upgrade	0.0	0.0	0.0	5.0	-3.9	0.5	-0.5	4
5	Smaller-scale distributed generation option with scope for small-scale network option	-2.5	7.0	2.3	4.4	-3.5	0.4	1.8	1
6	Smaller-scale demand-side option with scope for small-scale network option	-20.5	4.0	-8.3	-3.6	-11.4	-7.5	-0.8	5

B Glossary

Term	NER Ref	Meaning
Connection applicants	Ch. 10	A person who wants to establish or modify connection to a transmission network or distribution network and/or who wishes to receive network services and who makes a connection enquiry as described in cl. 5.3.2 of the NER. Note: In the context of Chapter 5A, the definition in cl. 5A.A.1 of the NER displaces this definition h.
Credible option	Cl. 5.15.2 (a)	An option (or group of options) that: (1) addresses the identified need; (2) is (or are) commercially and technically feasible; and (3) can be implemented in sufficient time to meet the identified need, and is (or are) identified as a credible option in accordance with paragraphs (b) or (d)(as relevant)
Dispute notice	Cl. 5.17.5 (c) (1)	The notice given by the disputing party, setting out the grounds for the dispute in writing as required under cl.5.17.5(c)(1) of the NER.
Disputing party	Cl. 5.17.5 (c)	The party disputing matters in the final project assessment report.
Draft project assessment report	Cl.5.10.2	The report prepared under cl. 5.17.4(i) of the NER
Embedded generating unit	Ch. 10	A generating unit connected within a distribution network and not having direct access to the transmission network.
Embedded generator	Ch. 10	A Generator who owns, operates or controls an embedded generating unit. Note: In the context of Chapter 5A, clause 5A.A.1 displaces this definition.
Final project assessment report	Cl.5.10.2	The report prepared under cl. 5.17.4(o) or (p) of the NER.
Identified need	Cl.5.10.2	Identified need means the objective a network business (or in the case of a need identified through joint planning under clause 5.14.1(d)(3) or clause 5.14.2(a), a group of network businesses) seeks to achieve by investing in the network.
Industry engagement register	Cl.5.10.2	A facility by which a person can register with a distribution network service provider their interest in being notified of developments relating to distribution network planning and expansion.
Interested parties	Cl. 5.15.1	In cl. 5.16.4, 5.16.5, 5.17.4 and 5.17.5 of the NER, a person including an end user or its representative who, in the AER's opinion, has the potential to suffer a material and adverse NEM impact from the investment identified as the preferred option in the

PACR (or the final project assessment report for a RIT–D).

Involuntary load shedding	Ch. 10	Load shedding where the load shed is not an interruptible load except load under the control of under frequency relays as described in cl. S5.1.10.1(a) of the NER, or a scheduled load.
Intending Participant	Ch. 10	A person AEMO has registered as an Intending Participant under Chapter 2.
Load	Ch. 10	A connection point or defined set of connection points at which electrical power is delivered to a person or to another network or the amount of electrical power delivered at a defined instant at a connection point, or aggregated over a defined set of connection points.
Load shedding	Ch. 10	Reducing or disconnecting load from the power system.
Load transfer capacity	Cl.5.10.2	Meeting load requirements for a connection point by the reduction of load or group of loads at the connection point and increasing the load or group of loads at a different connection point.
Network option	Cl.5.10.2	A means by which an identified need can be fully or partly addressed by expenditure on a transmission asset or a distribution asset which is undertaken by a network business.
Non-network option	Cl.5.10.2	A means by which an identified need can be fully or partly addressed other than by a network option or a SAPS option.
Non-network provider	Cl.5.10.2	A person who provides non-network options.
Options screening report	Cl.5.10.2	The report prepared under cl. 5.17.4(b) of the NER.
Potential credible option	Cl.5.10.2	An option which a RIT–D proponent or RIT–T proponent (as the case may be) reasonably considers has the potential to be a credible option based on its initial assessment of the identified need.
Preferred option	Cl. 5.17.1 (b)	The credible option that maximises the present value of the net economic benefit to all those who produce, consume and transport electricity in the NEM. For the avoidance of doubt, a preferred option may have a negative net economic benefit (that is, a net economic cost) where the identified need is for reliability corrective action.
Publish/publication	Ch. 10	<p>A document is published by the AER if it is:</p> <ul style="list-style-type: none"> (a) published on the AER's website; and (b) made available for public inspection at the AER's public offices; and (c) in the case of a document inviting submissions from members of the public – published in a newspaper circulating generally throughout Australia. <p>In Part B of Chapter 5, a document is published by the <i>distribution</i> business if it is published on the distribution business' website.</p>

Registered Participant	Ch. 10	A person who is registered by AEMO in any one or more of the categories listed in rule 2.2 to 2.7 (in the case of a person who is registered by AEMO as a Trader, such a person is only a Registered Participant for the purposes referred to in rule 2.5A). However, as set out in cl. 8.2.1(a1), for the purposes of some provisions of rule 8.2 only, AEMO, Connection Applicants, Metering Providers and Metering Data Providers who are not otherwise Registered Participants are also deemed to be Registered Participants.
Reasonable scenario	N/A	A set of variables or parameters that the RIT–D proponent does not expect to change across each of the relevant credible options.
Reliability corrective action	Cl.5.10.2	Investment by a transmission business or a distribution business in respect of its transmission network or distribution network for the purpose of meeting the service standards linked to the technical requirements of schedule 5.1 or in applicable regulatory instruments or SAPS performance and supply standards and which may consist of network options, non-network options, or SAPS options.
Renewable energy zone	N/A ⁴⁵	Either the definition: <ul style="list-style-type: none"> • In the NER, if the NER provides a definition. • In the AEMC's coordination of generation and transmission investment review, if the AEMC provides a definition in this review but has not defined it in the NER. • AEMO uses in connection with the ISP, if neither of the above apply.
RIT–D project	Cl.5.10.2	A project the purpose of which is to address an identified need identified by a distribution business, or a joint planning project that is not a RIT–T project.
RIT–D proponent	Cl.5.10.2	The network business applying the RIT–D to a RIT–D project to address an identified need. The RIT–D proponent may be: <p>(a) if the identified need is identified during joint planning under cl. 5.14.1(d)(3), a distribution business or a transmission business; or</p> <p>(b) in any other case, a distribution business.</p>
SAPS performance and supply standards		Service standards that a network business publishes following consultation. They must ensure that the regulated SAPS meets the SAPS quality of supply principle.
SAPS quality of supply principle		The quality and reliability of supply experienced by a distribution customer connected to a regulated SAPS should be no worse than the quality and reliability of supply that the distribution customer would experience if it were connected to the interconnected national electricity system.

⁴⁵ At the date of publication, the NER did not define 'renewable energy zone'. We anticipate the NER will eventually provide this definition.

Value of customer reliability

The value that electricity customers place on avoiding service interruptions. The VCR determines how much customers are willing to pay for improved service.

Zone substation

CI.5.10.2

A substation for the purpose of connecting a distribution network to a sub-transmission network.
