

Customer and Stakeholder Engagement Report

AusNet Services Transmission Revenue Reset Post-Lodgement Engagement Activities

Collaboration Workshop 3b | 23 June 2021

13 July 2021

Introduction

Background

AusNet Services owns and operates the Victorian electricity transmission network, providing electricity to 5.9 million customers. As a monopoly provider, AusNet is required to lodge a Revenue Proposal containing investment plans for each five-year regulatory period with the Australian Energy Regulator (AER). The development of these investment plans is referred to as the Transmission Revenue Reset (TRR) process and AusNet's next regulatory period will occur from 1 April 2022 to 31 March 2027.

Since AusNet lodged its Revenue Proposal with the AER in October 2020, there have been a number of changes to key information inputs which may impact on the Revenue Proposal. As a result, AusNet is developing a Revised Revenue Proposal which considers these changes. At a high level, these changes are:

- Updated demand forecasts from AEMO
- Updated market modelling information
- Declining system strength across the network
- The establishment of Victoria's Renewable Energy Zones (REZs) through the Victorian Government's REZ Development Plan
- The closure of Yallourn power station earlier than originally anticipated
- Continued refinement of project scopes and costs.

Consultation with stakeholders is a crucial part of this process, to ensure that AusNet's plans are efficient and in the long-term best interests of consumers.

AusNet's Revenue Proposal was informed by consultation with stakeholders through its TRR Customer Advisory Panel (CAP), several Deep Dive Workshops, and Customer Consultative Committee (CCC). In developing its Revised Revenue Proposal, AusNet seeks to continue and enhance its commitment to stakeholder engagement by collaborating with stakeholders on how to address the new information through the Revised Revenue Proposal.

Stakeholder Engagement Approach

In conducting its post-lodgement engagement activities, AusNet has stated its intention to collaborate with stakeholders by working together to develop alternatives and jointly identifying the preferred approaches for addressing the new information through AusNet's Revised Revenue Proposal. This is in line with the definition of *Collaborate* stage of the IAP2 Spectrum of Public Participation.

	NCREASING IMPACT ON THE DECISION				
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.



Introduction

Stakeholder Engagement Approach (cont.)

AusNet's post-lodgement engagement approach included facilitating four Collaborative Workshops over April and May 2021, with the intention of ensuring participants can directly impact outcomes. Workshop 3b was created in response to stakeholder feedback to provide an opportunity to collaborate further with stakeholders on how to address the impacts of declining network system strength in AusNet's Revised Revenue Proposal.

The stated objectives of each workshop are as follows:

Workshop 1 20 April 2021

To establish a strong, common foundation of knowledge about our Revenue Proposal and the impacts that new information may have

Workshop 2 3 May 2021

To focus on topics that are of interest to customers and stakeholders regarding the Revenue Proposal and the impacts of relevant changes

Workshop 3 17 May 2021

To align the
Revised Revenue
Proposal to reflect
customer and
stakeholder
preferences
where possible to
deliver best
outcome

Workshop 4 27 May 2021

To collaborate and develop the Revised Revenue Proposal with critical input from customers and stakeholders through adopting feedback

Workshop 3b

To spend
dedicated time on
the options
relating to how
AusNet manages
the uncertainty
associated with
network support
costs

Workshop 5 Date TBA – July 2021

To summarise insights from Workshops 2-4 and present initial responses to the Draft Decision and implications from stakeholder feedback

Purpose of this report

This report summarises the key items of discussion from Workshop 3b, including the information shared by AusNet with stakeholders, the views expressed and questions raised by stakeholders, and the response AusNet gave to stakeholders during the workshop. A list of attendees is provided on pages 11 and 12.

AusNet's objectives for Workshop 3b were to:

- Collaborate with stakeholders on how AusNet might manage the uncertainty that declining system strength introduces
- Explore impacts of declining system strength on AusNet's service standards

Role of KPMG

KPMG was engaged to support AusNet in its post-lodgement engagement activities by:

- Advising on stakeholder engagement techniques and contributing to the development of presentation materials
- Facilitating engagement workshops to enable contribution from all participants
- Documenting engagement workshops.

AusNet remains responsible for workshop content including information specific to its Revenue Proposal.

Workshop Details

Date Wednesday 23 June

Time 9:30am – 11:30am (AEST)

Location Microsoft Teams (videoconference)

All workshops were hosted virtually, reflecting stakeholder preference and to mitigate potential disruption due to the COVID-19 pandemic at the time.



Key Implications for AusNet's Revised Revenue Proposal

While a detailed report of discussion items is presented below, the following key points summarise the primary implications for AusNet's Revised Revenue Proposal.

- 1. Stakeholders acknowledged the high degree of uncertainty associated with network system strength, and the planning challenges this poses for AusNet.
- 2. Of the options presented in relation to treatment of the recovery of operational costs for AusNet's maintenance plan, Stakeholders prefer Option 2 whereby network support agreement costs are treated as pass-through provisions, because this results in customers paying actual costs and seems the more reasonable option in the context of the high degree of uncertainty.
- 3. Of the options presented in relation to recovery of operational costs for the Moorabool Terminal Station project, stakeholders prefer Option 3 whereby capex allowance is reforecast ex-ante to reflect likely timing and NSA costs are treated as pass-through, because this option provides greater certainty of actual costs.

Due to time constraints, AusNet was not able to discuss options for applying the Market Impact Component (MIC). Workshop 3b materials were made available to stakeholders, and all stakeholders were invited to provide their views and feedback.

Topic presented by AusNet

Stakeholder Engagement Approach

- KPMG provided a re-cap of the engagement approach, outlining:
- The engagement process to date
- The content from Workshops 1, 2, 3 and 4
- AusNet's approach to seeking stakeholders' view on where to focus the workshop discussion
- KPMG explained that Workshop 3b was held in response to stakeholder feedback to explore in more depth how AusNet might manage the uncertainty associated with network support costs
- KPMG provided stakeholders the opportunity to ask questions or provide comments on the engagement approach to date

Stakeholder input

A stakeholder expressed that given complexity of network system strength issues, it may be difficult for stakeholders to reach consensus within one meeting regarding the proposed options for:

- Operational cost solutions
- Cost recovery
- Applying the Market Impact Component (MIC) to the current regulatory period.

Stakeholders noted the challenge they face in assessing the impact of decisions on customers, particularly as they don't have access to as much information or analytics as AusNet when considering potential risk or cost impacts to customers.

How AusNet responded

AusNet confirmed to stakeholders that the session will provide a number of opportunities for them to share their views. If stakeholders require additional information, AusNet explained they are happy to share more materials directly.

AusNet acknowledged the level of uncertainty and complexity surrounding system strength, particularly given that the risk/cost/benefit profile of a given option varies according to the circumstances around the decision. AusNet committed to providing additional information as requested by stakeholders to enable them to provide an informed view. Following the workshop, AusNet provided stakeholders with detailed information about their proposed Market Impact Component of the Service Target Performance Incentive Scheme (STPIS) accounting for these issues.



Topic

System Strength Responsibilities

- AusNet outlined that responsibility for maintaining system strength in Victoria is split between four bodies:
 - AEMO National Planning
- AEMO Victorian Planning (and VicGrid)
- AEMO Operations
- AusNet Services
- AusNet outlined that they are:
- responsible for forward planning of outages
- required to cancel outages at AEMO Operations' request
- incentivised to limit market constraints from planned outages
- AusNet highlighted areas of responsibility which are unique to Victoria, stating that:
 - AEMO Victorian Planning and VicGrid are responsible for keeping the system accessible for maintenance
 - AEMO Operations must assess outage impacts on system operations and prevent planned outages which threaten system security
- AEMO is responsible for managing system strength on the Victorian transmission network, while AusNet is responsible for responding to operating issues caused by low system strength
- AusNet clarified the following items are in scope for discussion:
 - Impacts on TRR replacement and maintenance expenditures
- Incentive scheme implications
- AusNet noted that the following items that are out of scope for discussion:
- Augmentations to address system strength
- Impacts of the AEMC rule change on the approach to network system strength

What stakeholders said

Based on the market constraints incentives, stakeholders asked whether AusNet is incentivised to complete work at night rather than during the day, given the growing number of solar farms.

Stakeholders sought to clarify whether the incentive framework has changed to recognise the increase in distributed energy generation.

A stakeholder sought to clarify what was causing declining system strength in Victoria's network, and a stakeholder queried whether AusNet might improve system strength by using existing synchronous condensers at some generation locations as a low cost solution.

How AusNet responded

AusNet clarified that the market can be constrained either due to high demand (because this requires all generators to be active) or low demand (because this is when system strength issues may occur). As a result, it is important that AusNet maintains assets in service for as much of the year as possible. AusNet explained that due to market complexities, it has become difficult to complete planned outages without constraining a generator somewhere on the network. Whether AusNet is making a market impact depends on whether low cost generation is being constrained in order to have a price impact.

AusNet confirmed that AusNet's incentive framework will be discussed in more depth later in the session.

AusNet explained that there are three key issues driving declining system strength in Victoria's network:

- weak system strength in South Australia places constraints on AusNet's assets
- an increase in distributed renewable energy generation
- the early closure of projects (e.g. Heywood and Hazelwood) which held a large portion of synchronous generation.

AusNet explained that they are not responsible for maintaining system strength and it is, therefore, not their decision to move towards using synchronous condensers as a low cost solution. AusNet clarified that AEMO, with input from AusNet, determines the appropriate methods of maintaining system strength.



Topic

Impacts on AusNet's outage planning for replacement and maintenance

- AusNet outlined that as system strength declines, issues and constraints on parts of AusNet's replacement and maintenance plans have increased
- AusNet presented an Indicative In Service timeline to demonstrate the augmentation projects impacting system strength.
 - Some Integrated System Plan (ISP) or REZ Development Plan (RDP) projects will potentially come into service during the next regulatory period, strengthening the system
 - Timing of projects is uncertain and the effect on system strength is largely dependent on other generation closures
- Access for maintenance and replacement is anticipated to become increasingly difficult, increasing anticipated costs.
- Managing minimum demand is a key constraint, particularly as AusNet regularly perform major 500kV line switching to manage voltages in Victoria. This process ultimately wears out key circuit breakers
- AusNet highlighted that although outages remain stable over time, the MIC identified that an increasing number of generation dispatch intervals are being constrained by network outages.
- AusNet outlined that windows for outages that do not affect the market or network security is becoming increasingly limited
- After summarising AusNet's scope of responsibilities, the key drivers of uncertainty and the primary constraints being faced, AusNet invited stakeholder feedback:
 - Do you have any questions about Victoria's network system strength or what AusNet is responsible for?

What stakeholders said

Stakeholders sought information on AusNet's approach to managing the risk of over- or under-procurement of system strength solutions, and whether a temporary procurement option was a potential solution.

Stakeholders noted that weak system strength will likely continue to be an issue as the use of renewable energy continues to rise. Stakeholders discussed whether AusNet's objective should be to re-establish 'system normal', or to increase generation; this raised the question of whether to address declining system strength under direction from AEMO, or to procure system strength Network Support Agreements (NSA).

Stakeholders expressed that there is a risk of over procurement under the new AEMC rule change. Currently both Transmission Network Service Providers (TNSP) and generators have the ability to produce or procure system strength, potentially resulting in over supply and stranded assets.

Stakeholders provided positive feedback on the Cressy Tower Commissioning example, suggesting it clearly shows how outages impact costs, and demonstrates how specific circumstances inform AusNet's decisionmaking in practice.

Stakeholders queried whether maintenance work in winter and working outside normal trading hours (as is more often required for unplanned outages) results in higher labour costs.

Stakeholders commented that the high level of uncertainty must make it challenging for AusNet to plan, and questioned whether the cost of cancelled outages is built into the opex component of AusNet's Revised Revenue Proposal.

How AusNet responded

AusNet acknowledged that while some temporary, short-term procurement options exist, the uncertainty and constant change associated with system strength makes these difficult to leverage. This uncertainty also makes it challenging for AusNet to determine optimal solutions with confidence.

AusNet stated that decisions will be made based on each location's specific circumstances. AusNet explained that their Revised Revenue Proposal seeks to solve outage access issues rather than improve system strength (as the latter is out of their remit).

AusNet clarified that because system strength issues are also caused by power stations exiting the network, enforcing generator standards will not fully solve Victoria's system strength issues.

AusNet noted stakeholders' feedback regarding the Cressy Tower Commissioning case study.

AusNet confirmed stakeholders' question about labour costs, explaining that costs are typically higher for unplanned outages than planned outages.

AusNet explained that they are exposed to higher costs but would not pass them on at present. AusNet also stated that they are not looking to put a step change in place because of this uncertainty.



Topic

Operational solutions to maintain system strength during outages

- AusNet explained to stakeholders that in the absence of a long-term solution to system strength there are three operational responses available, falling under AEMO's and/or AusNet's responsibility:
 - 1. Defer the Work (AusNet)
 - 2. Obtain Network Support (AEMO and AusNet)
- 3. AEMO Direction (AEMO)
- AusNet invited stakeholders to discuss potential consumer impacts for each of the follow operational solutions:
- 1. Defer the Work:
 - Reduces short term costs and increases longer term costs
 - Risk of unplanned outage increases
- 2. Obtain Network Support:
 - If the project is deferred: reduces short term costs and increases long term costs, and risk of unplanned outages increases
 - If the project is not deferred: increases cost to consumers
- 3. AEMO Direction:
 - If the project is deferred: reduces short term costs and increases long term costs, and risk of unplanned outages increases
 - If the project is not deferred: increases cost to consumers
- AusNet invited stakeholder feedback:
- Do you have any questions about Victoria's network system strength or what AusNet is responsible for?

What stakeholders said

Stakeholders noted that system strength could improve in the next regulatory period due to the upgrade of new synchronous condensers and batteries. Stakeholders noted that changes in the network's system strength should be considered in conjunction with AusNet's planned maintenance schedule in order to reduce the need for NSAs and AEMO directions.

A stakeholder expressed a view that they prefer not to defer critical work. Stakeholders commented that having greater visibility of AEMO's analysis in relation to what system strength support is required during an outage would be a useful input.

Stakeholders affirmed AusNet's descriptions of the key operational responses available, given the high degree of uncertainty.

How AusNet responded

AusNet explained that the system strength issues outlined have developed very quickly in Australia. The particular issue with system strength during outages has arisen within the last 18 months.

AusNet noted stakeholders' comments.



Topic

Options for recovery of operational costs

- AusNet presented stakeholders with four ways of recovering operational costs:
 - AusNet pays for NSA using ex-ante cap: AusNet passes through forecasting costs to transmission charges; must pass AEMO's economic test; AusNet holds the the cost recovery risk
 - AusNet pays for NSA using passthrough: AusNet passes actual costs through to transmission charges; must pass AEMO's economic test
 - 3. AEMO pays for NSA: AEMO passes actual costs through to transmission charges; must pass AEMO's economic test
 - AEMO uses Directions: AEMO passes actual costs through to transmission charges
- AusNet shared options for recovery of operational costs for AusNet's Maintenance Plan:
 - Option 1: Forecast NSA step change required to deliver maintenance plan; AusNet may result in a loss or benefit through the opex efficiency scheme due to cost being difficult to accurately forecast.
- Option 2: Manage through NSA cost pass-through provisions; only actual costs are passed through; costs are highly uncertain (current median forecast is \$50M)
- AusNet shared options for recovery of operational costs for the Moorabool Terminal Station Project, (noting that all options result in project deferral due to the impost of NSA costs)
 - Option 1: Leave forecast in ex-ante capex allowance unchanged; NSA costs are capitalised and roll into the Regulated Asset Base (RAB); no Capital Expenditure Share Scheme (CESS) adjustments are made
- Option 2: Re-forecast in ex-ante capex allowance and include expected NSA costs
- Option 3: Re-forecast in ex-ante capex allowance to reflect likely timing; manage NSA costs though a pass-through (not subject to CESS)

In describing each option, AusNet provided detail on the consumer impacts.

What stakeholders said

Maintenance Plan

Given that AEMO is responsible for system strength, a stakeholder queried how AusNet proposed to allocate system strength support costs.

Out of the three options presented, stakeholders indicated their preference was Option 2 for AusNet's maintenance plan (managing through NSA cost pass-through provisions) for the following reasons:

- customers pay actual costs only, rather than estimated costs
- more reasonable option due to high levels of uncertainty.

Stakeholders seek to ensure that AEMO considers these costs as part of their long-term investments into system strength augmentation.

Moorabool Terminal Station

When discussing the cost recovery options for Moorabool Terminal Station, a stakeholder noted that it is difficult for consumer representatives to make assessments on preferred models without visibility of all aspects of decision-making – specifically, actual cost impacts.

Out of the three options presented, the majority indicated their preference was <u>Option 3</u> for AusNet's cost recovery plan for Moorabool Terminal Station for the following reason:

 given that uncertainty is so high, selecting the option with actual costs will provide a clearer outcome.

How AusNet responded

Maintenance Plan

AusNet explained that the split accountabilities within the Victorian network contribute to the need to ensure that each party is incentivised appropriately to minimise system strength issues. AEMO allocates these costs to end users through Transmission Use of System (TUOS) charges.

AusNet noted stakeholders' preferred option selection (Option 2) in relation to AusNet's maintenance plan.

Moorabool Terminal Station

AusNet acknowledged the challenge for stakeholders in advising preferred options without access to actual costs. AusNet explained that costs are currently estimated based on assumptions outlined in Workshop 3, highlighting that the uncertainty makes it difficult to estimate costs due to the magnitude of the project and degree of change in the network.

AusNet noted stakeholders' preferred option selection (Option 3) in relation to the Moorabool Terminal Station project.

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Торіс	What stakeholders said	How AusNet responded
Applying the MIC to work for customers and AusNet This topic was not discussed with stakeholders due to time constraints. As AusNet is committed to seeking stakeholder feedback, materials were made available and stakeholders following the workshop and they were invited to include the following information in their response: Preferred or ranked preference A brief explanation of preference Any other commentary or questions AusNet's materials explained that there has been a step change in the operational environment over the current regulatory period, resulting in the incentive scheme design being no longer fit for purpose AusNet's materials presented options regarding how AusNet should apply the MIC in the current regulatory period, highlighting consumer impacts based on each: Option 1: Do nothing: Set target and apply exclusions as specified in MIC Doption 2: Current MIC is not applied to AusNet: AER may need to formally consult the Service Target Performance Incentive Scheme (STPIS) to enable this to occur Quiton 3: AER outlines a pragmatic interpretation of exclusions in the TRR determination: Based on the principle that constraints not fully reflected in the data should be excluded from performance AusNet's materials noted that with strict exclusion interpretations, AusNet expects to receive a penalty in 2023-27 even if operational efforts are taken AusNet's materials posited that new constraints arising from changed operational conditions should be excluded, as they are not reflected in AusNet's target. This represents a pragmatic interpretation of exclusions and would result in AusNet having an incentive to continue to minimise the market impact of planned outages.	N/A	N/A



Topic	What stakeholders said	How AusNet responded
Piscussion items KPMG invited stakeholders to share further comments, feedback or questions in relation to the topics discussed during the workshop KPMG invited stakeholders to provide feedback on the engagement process to date, and specifically: How well the process has delivered on AusNet's engagement principles Whether there are ways to better engage an consult with stakeholders Whether there were any comments or suggestions for the coming workshops KPMG informed stakeholders that they will be invited to complete a short survey to seek feedback regarding the stakeholder engagement process to date	Stakeholders queried whether the current allocation of roles and responsibilities, including AEMO being the Victorian system planner, contributed to AusNet's challenges in responding to declining system strength. Stakeholders gave positive feedback about the engagement process, noting that the open discussions has led to greater insights into system strength issues.	AusNet advised that aligning on the key role and responsibilities of each organisation within the Victorian network has been challenging. While clarification has been provided by the AER, further alignment may be required through Rule changes. AusNet noted stakeholders' comments.



Attendance

Participants

Stakeholder Name	Organisation	Attendance
Andrew Richards	EUAA	Attended
Bev Hughson	AER CCP	Attended
Thanh Bui	Jemena	Attended
Bridgette Carter	BlueScope Steel	Attended
Adam Peterson	AER	Attended
Tennant Reed	Al Group	Attended
Inushka Dassanayake	Total Eren	Attended
David Prins	AER CCP	Attended
Mark Henley	AER CCP	Attended
David Monk	AER	Attended
Clare Preston	ACCC	Attended
Tim J Sheridan	DELWP	Attended
Andrew Chow	ACCC	Attended
Juris Kuzenecovs	AER	Attended
James Brown	AER	Attended
Belinda Sheldrick	AER	Attended
Aesop Ahn	ACCC	Attended
Leanna Tedesco	AEMO	Attended
David Chan	AER	Attended
David Headberry	Major Energy Users	Attended
Evan Lutton	AER	Apology
Andrew Chow	ACCP	Apology
Steve D Foster	DELWP	Apology
Mark Grenning	EUAA	Apology
Elizabeth Carlile	CitiPower / Powercor	Apology
Nick Eaton	Alcoa	Apology
Gavin Dufty	St Vincent de Paul	Apology
Julian Hales	DELWP	Apology
Trevor Lim	Total Eren	Apology
Jane Kelly	AER	Apology
Prajit Parameswar	Hydro Tas	Apology
Ben Ferguson	DELWP	Apology
Jess Young	DELWP	Apology
Ciara Sterling	Thriving Communities	Apology
Tom Parkinson	Clean Energy Council	Apology
Sarah Walsh	AEMO	Apology
Rudi Strobel	Jemena	Apology
Guillermo Alonso	GPG	Apology



Attendance

Participants (cont.)

Stakeholder Name	Organisation	Attendance
Lillian Patterson	Clean Energy Council	Apology
David Markham	Australian Energy Council	Apology
Simon Elias	Air Liquide	Apology
Aaron Tan	Air Liquide	Apology
Rodney Bray	United Energy	Apology
Simon Elias	Air Liquide	Apology
Rodney Bray	United Energy	Apology
Joe Spurio	AEMO	Apology

Facilitators and Observers

Stakeholder Name	Organisation	Attendance
Tom Hallam	AusNet	Attended
Herman De Beer	AusNet	Attended
Stephanie Judd	AusNet	Attended
Martin Cavanagh	AusNet	Attended
Melanie Tan	AusNet	Attended
Charlotte Eddy	AusNet	Attended
Stephanie Judd	AusNet	Attended
James Bleed	AusNet	Attended
Matt Pearce	KPMG	Attended
Grace Smith	KPMG	Attended
Victoria Lloyd-Jones	KPMG	Attended



Contacts in relation to this document:

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This report has been prepared as outlined with AusNet Services in the Scope Section of the engagement letter/contract dated 25/02/2021. The services provided in connection with this engagement comprise an advisory engagement, which is not subject to assurance or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently, no opinions or conclusions intended to convey assurance have been expressed.

The findings in this report are based on a qualitative study and the reported results reflect a perception of AusNet Services but only to the extend of the sample surveyed, being AusNet Services' approved representative sample of stakeholders. Any projection to the wider stakeholder group is subject to the level of bias in the method of sample selection.

No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by KPMG stakeholder consulted as part of the process.

No reliance should be place by KPMG on additional oral remarks provided during the presentation, unless these are confirmed in writing by KPMG.

KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

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