United Energy Distribution Pty Limited ABN 70 064 651 029



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Dear Sir

Re: Consultation Paper – National Transmission Network Development Plan 2017

United Energy (UE) appreciates the opportunity to respond on the Consultation Paper – National Transmission Network Development Plan (NTNDP) 2017. Overall, UE supports AEMO applying a strategic approach to development of the transmission network given the changing and uncertain planning landscape. Further UE appreciates the need for more coordinated and collaborative effort within the industry to minimise future uncertainties and to facilitate efficient investments in the network.

While the 2016 NTNDP included technical assessments of issues under three scenarios, it seemed to lack specific strategies to address the future uncertainties and issues identified. It would be beneficial to provide more detail on short, medium and long term strategic responses that can be applied under different scenarios for transmission network development.

The consultation paper and the 2016 NTNDP discussed options of creating new interconnectors to improve the strength and resilience of the future transmission network when more renewables displace conventional generation. If demand is expected to be flat or declining as forecast by AEMO, building new long-life assets might not be the most prudent strategy. Other alternatives will need to be explored including network and non-network solutions. Also a broader range of options including advanced control solutions and even changes to the wholesale market to adequately value the services that deliver system security and defer the need for expensive infrastructure builds.

The existing scenarios considered in the NTDNP are negatively biased. Given NTNDP is expected to be a strategic view of the transmission network, UE suggests including one positive growth scenario into the mix as it will widen and provide more balance to the study envelope. One example is Electric Vehicles (EV). AEMO's publications do not foresee EV as a significant disruptor. This is one area AEMO could assess in more detail, developing a scenario where EV does have a material impact in NTNDP.

UE welcomes the opportunity to participate further in this consultation and look forward to constructively contributing to the Forecasting and Planning Reference Group. If you would like more information please contact me directly on 03 8846 9745.

Kind Regards,

Rodney Bray

Manager Network Planning & Strategy