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Energy Policy WA

Submitted via: EPWA-Submissions@dmirs.wa.gov.au

Proposed Changes to the Electricity Networks Access Code – Priority Projects

We appreciate the opportunity to provide feedback on the proposed changes to the ENAC to enable the Minister for Energy to determine planned network augmentations as Priority Projects, effectively waiving the requirement for them to satisfy part (b)(i-iii) of the NFIT under 6.52 of the code.

We support the proposed changes, considering that:

- substantial network investment, including the stage 1 augmentations outlined by the SWISDA are urgently required to enable the system's transition.
- applying 6.52(b)(i-iii) of the NFIT under 6.52 of the code to these proposals would risk the delivery and timeliness of these augmentations. This would undermine reliability and delay the system's transition, increasing overall costs.
- We do not perceive other, preferable regulatory changes that could similarly enable the urgent delivery of the augmentations that the SWIS requires.

For these priority project determinations to achieve the ENAC objective to the greatest extent practicable, we note that further work outside these ENAC reforms is required to ensure that:

- Western Power has the resources and expertise required to deliver these projects on time and at efficient costs, which represent a step change in the scale of infrastructure required compared with previous decades.
- The ERA has the resources and expertise necessary to evaluate the projects' unit costs in a timely and constructive manner, noting the scale, urgency, and volume of the forthcoming projects.
- Policies to incentivise investment in generation and storage capacity are appropriately coordinated with the delivery of the priority projects such that there is a level, competitive and merit-based playing field for access to the new network infrastructure and routes to market.

Thank you for your consideration of our submission. If you would like to discuss further, please contact me at oscar.carlberg@alintaenergy.com.au or on 0409 501 570.

Yours sincerely

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