

3 February 2020

Gerard Reiter  
Executive Manager, Network Planning and Operations  
TransGrid

via email: [regulatory.consultation@transgrid.com.au](mailto:regulatory.consultation@transgrid.com.au)



Dear Mr Reiter,

### **Submission to the Broken Hill supply RIT-T PSCR**

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit legal centre based in New South Wales. Established in 1982, PIAC tackles systemic issues that have a significant impact upon people who are marginalised and facing disadvantage. We ensure basic rights are enjoyed across the community through litigation, public policy development, communication and training. The Energy + Water Consumers' Advocacy Program represents the interests of low-income and other residential consumers, developing policy and advocating in energy and water markets.

PIAC welcomes the opportunity to respond to TransGrid's consultation report.

We support the credible options that TransGrid has identified in the PSCR and look forward to more detailed costing of each as well as the cost-benefit analyses overall. We also look forward to further discussion on how the options involving gas turbines or grid-scale storage may be treated with respect to the transmission ring-fencing guidelines especially if all or a portion of these assets' values would enter TransGrid's Regulated Asset Base.

We note that, since TransGrid published the PSCR in November 2019, the AER has published its final Value of Customer Reliability estimates. We look forward to TransGrid reassessing the identified need in light of these updated numbers.

### **Continued engagement**

PIAC would welcome the opportunity to meet TransGrid and other stakeholders to discuss these issues in more depth.

Yours sincerely,

**Miyuru Ediriweera**  
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Public Interest Advocacy Centre

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