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Access Schemes are a key part of the NSW Government's work to coordinate and encourage investment in Renewable Energy Zones (REZ) and realise the objectives of the Electricity Infrastructure Roadmap and enabling legislation. The Central-West Orana REZ Access Scheme will be the first of its kind in the National Electricity Market.

The Department has published the Central-West Orana Renewable Energy Zone Issues Paper (the Issues Paper) to facilitate consultation on the access scheme models being considered for the Central-West Orana REZ. This form is for use by stakeholders who wish to make a submission on the Issues Paper to provide feedback to the Department. This form is not required to have your say on the Issues Paper - the Department also welcomes free form submissions.

Submission response options

We encourage stakeholders to use this form to respond to the specific questions raised in the Issues Paper. This will help us interpret and incorporate your responses into our decision making process.

We also welcome free form submissions and responses instead of, or in addition to, this submission form.

Please email your submission form and/or free form response to: rez@planning.nsw.gov.au with 'CWO REZ Access Scheme Issues Paper' in the subject line. Please identify if you would like your submission to be confidential or anonymous.

Disclaimer

The Department encourages publication of submissions to build transparency in the decision-making process and ensure that a variety of views are understood by the public and relevant stakeholders.

Providing submissions is voluntary, is not assessable, and will not impact an entity's participation in, or be used in the assessment of, any future procurement or competitive process regarding the Central-West Orana REZ or other NSW Government programs.

All submissions will be made publicly available on the Department's website unless a submission author indicates a preference below for confidential treatment. In the absence of an explicit declaration to the contrary, the Department will assume that all information can be made public.

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- directly relevant Department staff, consultants, professional service providers and advisers
- other parties where authorised or required by law to be disclosed.

Participants should also be aware that provisions of the *Government Information (Public Access) Act 2009 (NSW)* may apply to any documents submitted (and information should be submitted on that basis) and to any summary report compiling key information and feedback.

Submissions may also be shared with the Australian Energy Market Operator, Australian Energy Market Commission, Australian Energy Regulator, the Energy Security Board, TransGrid, the Clean Energy Finance Corporation, Australian Renewable Energy Agency, Essential Energy, Endeavour Energy and AusGrid to better understand and respond to issues raised. Please make

Central-West Orana Renewable Energy Zone Access Scheme Issues Paper



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Submission type	<input type="checkbox"/> Individual <input checked="" type="checkbox"/> Organisation <input type="checkbox"/> Other Click or tap here to enter text.
Approving author name	Dan Mascarenhas
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Stakeholder group	<input checked="" type="checkbox"/> Energy generation <input type="checkbox"/> Energy storage <input type="checkbox"/> Ancillary services <input type="checkbox"/> Electricity distribution provider <input type="checkbox"/> Transmission provider <input type="checkbox"/> Energy industry/market body <input type="checkbox"/> Financial institution of financial services <input type="checkbox"/> Consumer advocacy <input type="checkbox"/> Government <input type="checkbox"/> Individual <input type="checkbox"/> Other (please specify) Click or tap here to enter text.

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Questions

The fillable fields for answers to these questions will expand to accommodate the length of your response.

1. Objectives and evaluation

<p>Question 1: If the CWO REZ Access Scheme delivers on the proposed objectives and benefits, how would connecting projects value connecting under this Scheme rather than elsewhere under current NEM network access arrangements? Should proposed benefits be given weightings, and if so, what should these be?</p>	<p>Alinta Energy welcomes the proposed accessed scheme and the benefits it will provide to newly constructed generation and storage projects. We understand that the CWO REZ will comprise wholly new transmission infrastructure which will connect the REZ Reference Node to the Regional Reference Node. Under this arrangement, connecting developers would secure an access right to the REZ RN, streamlined connection and development approvals, and cost-efficient costs associated with operational start-up.</p> <p>We believe that these benefits should be quantified to improve the transparency of first-mover benefits, to encourage the connection of generation and storage, and minimise the risks of stranded or under-utilised transmission infrastructure to protect consumers. Projects which can maximise the effectiveness of the REZ and therefore deliver strong community benefits, should be prioritised.</p> <p>However, Alinta Energy also notes that the access rights are not fully firm to the RRN, and that the Access Scheme does not contemplate the wider risks that connecting parties may face (i.e. congestion between REZ RN and RRN, increasing MLF risk within the REZ, system security risk outside of the REZ, interactions with the Long-Term Energy Supply Agreement policy) etc. We strongly encourage a comprehensive review of these matters to ensure that the Access Scheme delivers its proposed benefits.</p>
<p>Question 2: What, if any, additional benefits should the CWO REZ Access Scheme deliver to provide value to connecting generation and storage projects?</p>	<p>Per our response to Q1, Alinta Energy is concerned that the Access scheme will lose value in the eyes of prospective developers due to the commercial risks associated with possible network constraints to the RRN.</p> <p>Alinta Energy encourages further consideration of the overall benefits of an expansion of the transmission corridor connecting the REZ RN to the RRN. This could be delivered in partnership with AEMO (via the 2022 ISP), the ESB (through its ISP framework and interim REZ framework/guidelines), working with the</p>

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	network service provider. Any expansion should be progressed in line with a net benefits RIT-T to ensure consumer interests are protected.
Question 3: Do you agree with the proposed evaluation criteria? What, if any, additional criteria should be considered?	Alinta Energy agrees with the proposed evaluation criteria. However, we note that these only review connection to the REZ, but does not consider ongoing system impacts, how REZ are to be financed, and the cost recovery split between consumers and generators. Regarding the latter two issues, a RIT-T process, to explore transmission infrastructure options, cost-efficient network design and cost recovery, would address some of these issues, in addition to further Access Scheme governance.

2. Access scheme models

<p>Question 4: Which of the shortlisted models presented is preferred? Which best balances the need to deliver value to investors with the need to maximise utilisation of the REZ, and together achieve the access scheme's objectives?</p> <p>In particular, does the 'non-firm' connection right, under Option 1 provide sufficient certainty to investors to be of value? If it does not, is this outweighed by the increased utilisation of the REZ that would result under such non-firm connection rights?</p>	<p>Of the Access Options presented in the consultation paper, Alinta Energy prefers option 2B.</p> <p>Alinta Energy understands that REZ access rights will be available to renewable generation and storage projects. We encourage the NSW Department to consider taking a technology neutrality approach, as a diverse range of (existing and new) technologies and generation profiles will maximise both REZ capacity and export capability.</p> <p>For example, having:</p> <ol style="list-style-type: none"> 1. An off peak renewable generation source sharing access with a peak time generation source; or 2. A renewable generation source sharing transmission capacity with a gas peaking plant, when it is not generating. <p>However, assuming the range of targeted technologies remains unchanged, we believe the Department should approach the policy question of 'which access option is the best' from the commercial perspective of a renewable developers.</p> <p>As such, of the Access Options presented in the consultation paper, Alinta Energy prefers options 2B due to the flexibility that this option provides to different technologies and generation profiles. In our view, a firm (or as close to fully firm) access to revenue for electricity supplied to the RRN is critical to the</p>
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Central-West Orana Renewable Energy Zone Access Scheme Issues Paper



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	<p>viability (and therefore financial business case) of a generation asset. Unfortunately we do not consider that Option 1 provides a satisfactory level of access protection, nor does it support enough flexibility with respect to the access right product. Alinta Energy considers that increasing the utilisation rate Option 1 could lead to an increased risk of congestion risk within the REZ – this is then compounded when considered in conjunction with congestion risk to the RRN.</p> <p>We also note the Department's view that option 2A and 2B largely align with the ESB's financial access protection model and could be transitioned into financial access rights under a national scheme. We agree with this sentiment, although a further detailed assessment would be required.</p>
<p>Question 5: Are there other access models that you consider would be superior to the shortlisted models in this paper? If so, what are these models, and what are their strengths in comparison to the shortlisted models?</p>	<p>Alinta Energy encourages the Department (working with AEMO and the network service provider) to explore ways to make the access rights firmer, specifically looking at risks between the REZ RN and the RRN.</p> <p>As suggested above, further strengthening of this transmission corridor could be explored, weighing the costs to consumers against the increased benefits of cheaper electricity to meet demand.</p> <p>In addition, some of these costs could be recovered using revenue derived from the over recovery of MLF charges and/or from auctioning access rights. We note these options were explored by the AEMC's COGATI Review.</p> <p>Ultimately to ensure that the REZ model is successful, consideration of how best to build out intra regional constraints in a timely manner (to support new generation and access to the RRN) is necessary.</p>
<p>Question 6: How could the characteristics of either Option 1, 2A or 2B be adjusted to improve them in a manner that achieves the access scheme's objectives?</p>	<p>Refer to responses to Q2 and Q5</p>
<p>Question 7: Characteristics such as more granular access rights (for example, rights defined in five-minute intervals) and tradeable rights can provide flexibility to access right holders, but also make the access scheme more complex. How should the trade-off between flexibility for access right holders</p>	<p>Developers will assess their commercial level of risk and potential for revenue with all new investment projects. Ultimately, if the project risks outweigh the benefits, the investment case will fall over. To this end, the design of the Access Scheme will dictate the level of</p>

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<p>and simplicity of the access scheme be assessed? Which better achieves the access scheme's objectives?</p>	<p>flexibility provided to developers to manage risks.</p> <p>While Alinta Energy agrees that consideration should be given to the trade-off between scheme complexity and participant flexibility, we support the targeted improvements to address flexibility and risk outlined in the question (i.e. interval based access rights and secondary trading). These will improve the attractiveness and value of the rights, and will contribute to overall net benefits.</p> <p>However, importantly, the role and impact of consumers should feature prominently in the Access Scheme's objectives as they will largely fund the necessary transmission augmentations associated with establishment of the REZ and remediation to address intra regional constraints.</p>
<p>Question 8: If not nameplate capacity, what is the appropriate level of capacity that should be used to determine requirements for access rights coverage that would better achieve the scheme's objectives? If a Probability of Exceedance (POE) value is used, what process should be used to verify this?</p>	<p>Alinta Energy supports the use of nameplate capacity (i.e. OEM specified physical capacity) to in determining the split of access rights. Whatever metric is used needs to be accurate, forecastable and transparent, to allow potential generation and storage developers to develop their investment business case, and ultimately their decision to seek an access right.</p>
<p>Question 9: How should the allocation of access rights to hybrid (storage plus generation) assets be approached? What 'shape' of access rights would suit a hybrid asset? How could projects which use some of their maximum capacity 'behind the meter' be accounted for in determining the appropriate level of capacity for access rights coverage?</p>	<p>Broadly speaking for the purposes of access right allocation, hybrid assets should be treated as if they were a stand-alone generator because its connection to the REZ would be identical. The shape of access rights may require a case-by case assessment until some trend analysis to determine a standard profile can be agreed.</p> <p>Alinta Energy discourages the Department from reinventing the wheel. We believe the interim connection and registration processes that AEMO has set up in the NEM is well understood by incumbents and new entrants. In addition, the AEMC are working closely with AEMO on a rule change to integrate energy storage into the NEM, in addition to the ESB's Post 2025 Market Review which is also considering these matters.</p> <p>As such we recommend the Department draw from these processes to simplify scheme operations .</p>

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<p>Question 10: Is there a minimum term (in years) for which access rights would need to apply to benefit project finance?</p>	<p>Alinta Energy considers that a REZ generator should secure its access right for the life of the project as long as its plant remains operational.</p> <p>However, we believe that it would be beneficial to maintain consistency across the main terms/policy decisions of the REZ Access Scheme and the (yet to be consulted) framework for LTESAs. Ideally, the term of support should be harmonised across these two frameworks.</p>
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Option 1: Limited physical connection model

<p>Question 11: Under Option 1, connected generation capacity could be capped above the capacity of the REZ Shared Network. How should generation and storage capacity be set or capped to optimise REZ Shared Network utilisation without introducing too much constraint risk?</p>	<p>An optimal mix of generation, storage and load should be encouraged to connect to the REZ to maximise network usage and export capacity. Under a physical connection model, Alinta Energy agrees that an overutilisation strategy will deliver a 'closer fit' to maximum network use, however this would also likely make access rights less firm.</p> <p>For this reason, we do not support implementation of this option.</p> <p>However, if implemented, we suggest that generation and storage be set based on an average SRMC (including income via environmental schemes (ie. LGCs) by technology types. Allocation and (if necessary) capping of access rights should be based on a merit order bid in by proponents.</p>
<p>Question 12: How could network capacity be allocated between different generation types? Should it, for example, be based on a particular, pre-defined generation profile ("shape") for different types of generation technologies?</p>	<p>Refer to our response to Q11.</p>

Option 2A and 2B: Financial compensation models

<p>Question 13: How would 24-hour access rights impact the value and efficiency of a financial compensation model? If access rights were defined as flat, 24-hour, access rights, would access right holders be incentivised to firm up their generation to make efficient use of the access rights (either technically, or commercially with sharing arrangements)? If not, what</p>	<p>Alinta Energy does not believe that a 24-hour access right would deliver maximum network utilisation as a result of the natural generation profiles of the technologies that were to be allocated a right (i.e. the pool of access holders is smaller under option 2A when compared to option 2B). Even if this risk was minimised by allowing secondary trading to generators with an incentive to firm up their generation, it may not</p>
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adjustments would need to be made to the access scheme design to incentivise this?	<p>be fully removed due to the limited number of rights available.</p> <p>One suggestion to improve the attractiveness of this option is to make it a 'technology profiled' access right. I.e. access rights for a typical daily generation curve. Spare capacity could then be allocated to other generation technologies.</p>
Question 14: Would currently available information, including solar and wind forecasts for corresponding Tier 1 generators, be sufficient for Tier 2 access right holders to make a reasonable assessment of the risk of being constrained off? Or would additional data need to be available to achieve this?	Access to currently available market information on Tier 1 generators will assist in a Tier 2 holder assessment, however we also consider that specific transmission network information is necessary. Specifically this includes the condition of the network, availability of transmission capacity and details of prospective generation (i.e. those with live enquiries) located outside of the REZ.
Question 15: With reference to Appendix B, to what extent should curtailment (and therefore the compensation mechanism) take bid price or market settlement price into account? In particular, what would be the downside to limiting compensation to only the bids from Tier 1 access right holders that are below the market settlement price?	<p>Alinta does not support limiting compensation to access holders that are below the market settlement price. Doing so would reduce the firmness and therefore the attractiveness of an access right.</p> <p>Alinta Energy notes two points for further consideration by the Department:</p> <ol style="list-style-type: none"> 1. The proposed Tier 1 access rights are not firm. As such any compensation mechanism with in the REZ does not guarantee full access to the RRN. Therefore any risk of curtailment to the RRN will adversely impact generation investment. 2. The LTESA framework and contract instrument could be designed to address this risk, however the Access Scheme and LTESA framework would need to be complementary and provide prospective REZ generators with a good chance of achieving both instruments.
Question 16: In what ways could the proposed models and compensation mechanism design result in changes to the bidding strategies of Tier 1 and Tier 2 access right holders? Would this be expected to have a material impact on the NSW market?	<p>Refer to our response to Q15.</p> <p>However, it is important to note that the bidding strategies of generation will be influenced by their contracted position. Therefore a generator's status as a Tier 1 or Tier 2 access holder might influence their bids.</p>

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<p>Question 17: There could be circumstances in which the revenue earned by Tier 2 access right holders will not equal the revenue lost by the Tier 1 access right holders through subsequent curtailment. This includes instances of intra-REZ constraints, and when MLFs for Tier 2 generators are systematically lower than for Tier 1 generators. What are the other circumstances, if any, in which potential 'compensation inadequacy' may occur? How material is this risk for Tier 1 access right holders in comparison to the open-access regime?</p>	<p>We believe this is hard to determine with accuracy. From a commercial perspective, ultimately the economics of an individual investment will be determined by an assessment of the level of perceived risk (including a revenue shortfall caused by compensation inadequacy). Should the shortfall be material, it would have a detrimental impact on a project's future.</p> <p>Shortfalls could be caused by a number of reasons and we encourage the Department to explore the probability of a "constraint" occurring – including by transmission, system physics, demand, supply, fuel etc.).</p>
<p>Question 18: Does this Issues Paper identify the key risks associated with the Financial Compensation Models? Can the risks be sufficiently managed through the design features of the models and the proposed compensation mechanism referred to in this Issues Paper?</p>	<p>Yes – refer to our response to Q15.</p>
<p>Question 19: How would the implementation of the financial compensation models impact existing contracts, such as PPAs? Could the compensation mechanism be appropriately accounted for in the design of new contract structures?</p>	<p>Existing contracts will be unable to easily adjust to the financial compensation model without facing some degree of cost and renegotiation of key terms. It is therefore possible that a number of existing contracts could be rendered unworkable.</p> <p>However, Alinta Energy believes that new PPAs could be developed to fit within the Access Scheme. The PPA owner would need to assume a degree of risk and MLF, and this would be reflected into the offtake price offered.</p>

Other models considered but not progressed

<p>Question 20: The NSW Government is not proposing to progress the Limited NEM Bidding and REZ Locational Marginal Pricing models further at this time. Are there elements unique to these two models which should be considered for integration into the models that have been shortlisted?</p>	<p>Click or tap here to enter your answer to question 20.</p>
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3. Access scheme design issues

<p>Question 21: How valuable is the ability to trade access rights, and in what circumstances would this be useful?</p>	<p>The ability to trade access rights is very valuable. Doing so will provide improved flexibility to access holders and would increase market liquidity by allowing secondary trading.</p> <p>However, the overall value is dependent on the final access scheme design and the firmness of the access right.</p>
<p>Question 22: To what extent would flexibility to trade access rights increase the value of access rights for their holders? How flexible and unrestricted would access rights trading need to be to provide value?</p>	<p>See answer to Q21 above.</p>
<p>Question 23: Would the introduction of a central access rights trading platform be of benefit to access right holders? If so, why? If beneficial, then which party would be best placed to design, maintain and operate this trading platform?</p>	<p>Please refer to our response to Q21. A central platform would assist with trades and improve transparency, however as above this policy design decision is dependent on the firmness of the access rights.</p> <p>Should the a platform be created, it should be designed, operated and governed by an appropriate (new or existing) NSW authority with suitable financial experience.</p>
<p>Question 24: For generation projects connecting to the REZ, how important is it that storage is required to purchase access rights (i.e. that total connecting storage capacity is limited)? If storage was not to be required to purchase access rights, how high is the risk of storage competing with (i.e. curtailing) generation dispatch?</p>	<p>Its is critically important to encourage storage and other load projects into a REZ to soak up generation during a binding network constraint at the REZ RN. Doing so will assist in building the investment case for generation projects as well as improving (and retaining over the longer term more favourable) MLFs .</p> <p>While we do not believe storage should be required (nor are incentivised) to purchase access rights for imports, it may be necessary under some circumstances (particularly where other non-renewable forms of generation are permitted into the REZ) to require them to secure Teir 2 export access rights where they complete with generation during higher prices.</p> <p>However as a general principle for the sake of simplicity, we would be comfortable for the connection of storage without the requirement for an access right, set at an appropriate percentage of total network capacity. As a suggestion, this should be no more than 40 percent.</p>

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<p>Question 25: Would proponents of storage projects value firm access rights? In the financial compensation models, how would storage operations differ under Tier 1 versus Tier 2 access rights? How could an access scheme provide sufficiently flexibility for storage to connect in future as technology costs come down and the market evolves?</p>	<p>From a commercial perspective, the value proposition for storage projects is different to intermittent renewable generation. However, there may also be value from increasing the types of technologies that are able to connect to the REZ – refer to our response in Q4.</p> <p>The main difference in value proposition is that during times of congestion:</p> <ul style="list-style-type: none"> ** storage can largely assist renewable generation by absorbing excess generation to minimise the impacts of a constraint; and ** export to local load and/or the wider grid at low renewable generation times when market prices are high <p>**Re our response to Q24 related to other generation technologies and storage, this will require further consideration to ensure that the access scheme is enduring.</p> <p>Generally speaking – we do not believe storage operations would differ under the Tier 1 and Tier 2. This is because, as above, their natural incentive is to charge at low prices and export at higher prices; and this behaviour is complementary to renewable generation projects.</p>
<p>Question 26: Would prevailing market signals provide sufficient and appropriate incentive for storage to operate in a manner that is aligned with the needs of the REZ? If not, then what REZ-specific types of incentive mechanisms should be considered to incentivise load and storage to consume electricity when the REZ Shared Network is congested?</p>	<p>Yes we believe market signals will provide appropriate and timely incentives to encourage storage projects within the REZ.</p> <p>See response to Q25 above.</p>
<p>Question 27: If an incentive mechanism for storage is implemented how should the costs of this arrangement be recovered?</p>	<p>Costs should be recovered from generators in the REZ that contract directly with the energy storage operator.</p>
<p>Question 28: How should the treatment of storage under the CWO REZ Access Scheme account for differences between long-duration storage and fast-firming technologies?</p>	<p>In our view, long-duration storage is necessary to address energy reliability issues, whereas fast-firming technology would be generally used to address system ancillary requirements.</p> <p>We therefore do not believe that fast-firming technologies would likely be impacted by market constraints.</p>

Central-West Orana Renewable Energy Zone Access Scheme Issues Paper



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<p>Question 29: How should load be integrated into REZs and what types of incentives (if any) would be needed to attract load to connect to the REZ Shared Network?</p>	<p>Alinta Energy believes suitable incentives for loads (particularly large loads) already exist. For example, an attractive MLF and the ability to directly contract cheaper energy.</p> <p>Additionally, the emergence of REZ will naturally result in the creation of local industries, jobs and residential demand.</p> <p>Therefore, no further incentives are necessary.</p>
<p>Question 30: Would additional incentives be necessary, beyond market-based commercial incentives, to encourage storage/load to increase their electricity use during periods of REZ network congestion?</p>	<p>No – refer to our responses to Q24 and Q25</p>
<p>Question 31: If an incentive mechanism for load is implemented how should the costs of this arrangement be recovered?</p>	<p>Dispite to our response to Q29, if the Department believes an incentive mechanism for load is necessary, costs from this arrangement should be recovered from all beneficiaries (i.e. generation and loads).</p>
<p>Question 32: How should the potential impact of changes in distribution load and embedded generation on the CWO REZ hosting/export capacity be incorporated into the REZ Access Scheme design and implementation?</p>	<p>Any generation / load that increase transfer capability should be compensated.</p> <p>Ultimately we should have market based mechanisms incorporated.</p>
<p>Question 33: Should non-scheduled generation and exempt generators be required to hold access rights under the CWO REZ Access Scheme, and/or should the total capacity of non-scheduled generation or generation from exempt generators permitted to connect be capped? Is there an alternative approach to the treatment of non-scheduled generation or generation from exempt generators which should be considered?</p>	<p>No. Alinta Energy believes the treatment of non-scheduled and exempt generators should mirror the arrangements reflected in AEMO's registration and connection framework.</p> <p>AEMO's framework recognises that these generators are typically micro generation sites which do not export and as such have no real impact on wholesale markets.</p>
<p>Question 34: If 'use it or lose it' provisions were introduced, how should the utilisation requirements be set/measured? What exemptions or concessions should be considered?</p>	<p>Alinta Energy generally supports the establishment of these provisions. However we are also mindful of the adverse impact it could have on consumers noting that transmission is funded by them. Therefore such a mechanism should only be introduced if consumer risks can be minimised or if a targeted over-utilisation strategy can be implemented fairly across all stakeholder groups.</p> <p>Introducing such a provision may be helpful in</p>

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	<p>instances where permanent generation operational decisions are taken, for example where a generation asset is derated post commissioning, mothballed or retired.</p> <p>However, as a mid-decision point and further incentive on generator aimed at protecting consumer investments, a policy decision could be taken to allow generators a timed choice to either on-sell the access right themselves in a secondary trading market, or to repurpose the access right to a new project. If neither of these occur within a specified time period, the access right should be re-sold to the market.</p>
Question 35: If an access right holder was required to return some or all of its access rights under the 'use it or lose it' provisions, how should these provisions be structured?	Refer to last paragraph in our response to Q34.
Question 36: What impact do you consider capping of connection in a REZ, and the proposed access scheme models, will have on reducing the risk of volatile MLFs? Are additional measures warranted? If so, what measures?	Capping of connection to the REZ would stabilise the MLF to the REZ, however the open access framework would likely impact the MLF unless additional load or storage was incentivised to connect.
Question 37: What are your views on the appropriateness of the principles for managing the interface between the CWO REZ Access Scheme and common DCAs/DNAs? How could consistency between the CWO REZ Access Scheme and access policies on DCAs and DNAs best be achieved?	

4. Other coordination initiatives

Question 38: Would a process to coordinate connection assets for multiple projects be of interest? If so, what coordination initiatives would be of interest?	Click or tap here to enter your answer to question 38.
Question 39: Given the unique nature of connecting to coordinated REZs, such as the CWO REZ, the barriers to coordination of connection assets may be reduced. What further barriers to coordination will still need to be overcome, and how could this be achieved?	Click or tap here to enter your answer to question 39.
Question 40: What opportunities exist for the NSW Government to improve connection processes in the CWO REZ? What improvements would deliver greatest value?	Please refer to our response to Q6.

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Question 41: What, if any, additional connection challenges could be created under the CWO REZ Access Scheme? How could these be mitigated?	
Question 42: What value could be delivered to generation and storage projects through centralised approaches to connection and system services, and what are the trade-offs? For example, would projects be willing to forego optionality around aspects of their project through requirements like minimum equipment standards, to reduce costs and the risk of potential delays to commissioning?	<p>Most projects will have some common requirements and some project specific requirements.</p> <p>Ultimately one would need to assess the const/benefit based on specific proposals around standardisation vs bespoke arrangements.</p>

5. Open comment

Question 43: Are there any other matters you wish to raise relevant to this issues paper?	<p>Click or tap here to enter your answer to question 43.</p>
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