Powerlink Queensland

Project Specification Consultation Report

30 November 2020

Addressing the secondary systems condition risks at Innisfail

Document purpose

For the benefit of those not familiar with the National Electricity Rules (the Rules) and the National Electricity Market (NEM), Powerlink offers the following clarifications on the purpose and intent of this document:

1. The Rules require Powerlink to carry out forward planning to identify future reliability of supply requirements[1] and consult with interested parties on the proposed solution as part of the Regulatory Investment Test for Transmission (RIT-T). This includes replacement of network assets in addition to augmentations of the transmission network. More information on the RIT-T process and how it is applied to ensure that safe, reliable and cost effective solutions are implemented to deliver better outcomes to customers is available on Powerlink's website.
2. Powerlink must identify, evaluate and compare network and non-network options (including, but not limited to, generation and demand side management) to identify the '*preferred option*' which can address future network requirements at the lowest net cost to electricity customers.
3. The main purpose of this document is to provide details of the identified need, credible options, technical characteristics of non-network options, and categories of market benefits addressed in the assessment. In particular, it encourages submissions from potential proponents of feasible non-network options to address the identified need.

[1] Such requirements include, but are not limited to, addressing any emerging reliability of supply issues or relevant *ISP actionable projects* identified in the Australian Energy Market Operator's (AEMO) latest Integrated System Plan (ISP), for which Powerlink has responsibility as the relevant Transmission Network Service Provider (TNSP).

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Executive Summary

Ageing and obsolete secondary systems at Innisfail Substation require Powerlink to take action

Innisfail Substation is located approximately 70 kilometres south-east of Cairns in Far North Queensland (FNQ). The site was originally established in the late 1950s as part of the Kareeya Hydro Power Station project to provide electricity to coastal communities in the area. It continues today as a 132/22kV bulk supply point for Energy Queensland's distribution network for the Innisfail area. Planning studies have confirmed there is a long-term requirement to supply the existing electricity services provided by Innisfail Substation.

The secondary systems at Innisfail broadly perform the functions of transmission element protection, data collection, remote (and local) control and monitoring. Many of the current systems were installed in 2003 and are reaching the end of their technical service lives, with respective manufacturers slowly withdrawing support and limited spares available.

Increasing failure rates, along with the increased time to rectify the faults due to the obsolescence of the equipment significantly affects the availability, reliability and technical capability of these systems to continue to meet the requirements of the National Electricity Rules (the Rules).

Powerlink must therefore take action to ensure ongoing compliance with the Rules.

Powerlink is required to apply the RIT-T to this investment

The estimated capital cost of the most expensive credible option to address the identified need meets the minimum threshold to apply the RIT-T.

As the proposed investment is to meet reliability and service standards specified within Powerlink's Transmission Authority, as well as guidelines and standards published by the Australian Energy Market Operator (AEMO), and to ensure Powerlink's ongoing compliance with Schedule 5.1 of the Rules, it is classified as a 'reliability corrective action'[2].

The identified need has not been included in the most recent Integrated System Plan (ISP) and is therefore subject to the application and consultation process for RIT-T projects not defined as *actionable ISP projects*[3].

Powerlink has presented two credible network options in this Project Specification Consultation Report (PSCR) to maintain the existing electricity services, ensuring an ongoing reliable, safe and cost effective electricity services to customers in the area.

Powerlink has adopted the expedited process for non-ISP projects for this RIT-T[4], as the preferred option is below $43 million and is unlikely to result in any material market benefits, other than those arising from a reduction in involuntary load shedding. The reduction in involuntary load shedding under the credible network options is included in the risk cost modelling and consequently represented in the economic analysis of the options.

A non-credible Base Case has been developed against which to compare the credible option

Consistent with the Australian Energy Regulator's (AER's) RIT-T Application Guidelines[5], the assessment undertaken in this PSCR compares the net present value (NPV) of the credible network options identified to address the emerging risks, relative to a Base Case.

The Base Case is modelled as a **non-credible** option where the existing condition issues associated with an asset are managed via operational maintenance only, resulting in an increase in risk levels due to deterioration of asset condition and rectification of failures taking longer due to obsolescence issues. These increasing risk levels are assigned a monetary value and added to the ongoing maintenance costs to form the Base Case.

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[2] The Rules clause 5.10.2, Definitions, reliability corrective action.
[3] Refer to Clause 5.16.2 of the NER.
[4] In accordance with clause 5.16.4(z1) of the Rules and S4.1 AER Regulatory investment test for transition application guidelines, August 2020
[5] AER, Regulatory investment test for transmission application guidelines, August 2020

Proposed network options to address the identified need

Powerlink has developed two credible network options to maintain the existing electricity services, ensuring an ongoing reliable, safe and cost effective supply to customers in the area.

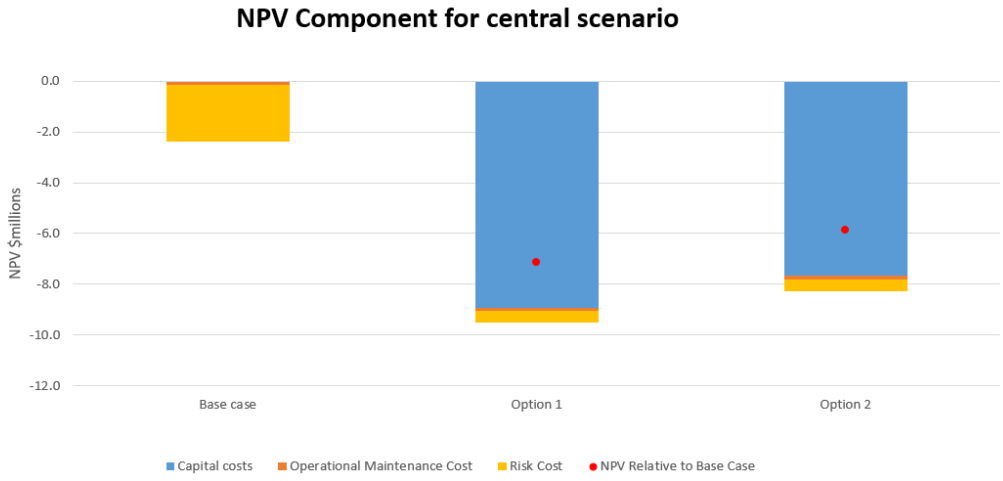
Table 1 shows the capital cost of the two credible network options, along with their NPVs relative to the Base Case. Of the two credible network options, Option 2 has the highest NPV.

Table 1: Summary of the credible network option

Option	Description	Total costs ($m) 2020/21	NPV relative to base case ($m) 2020/21
1	Full replacement of all secondary systems within the existing building by December 2024	12.90	-7.12
2	Full replacement of all secondary systems in a new demountable building by December 2024	11.63	-5.86

Figure 1 shows the absolute NPVs of the Base Case and the credible network options. Both credible options significantly reduce the total risks arising from the condition of the ageing and obsolete secondary systems at Innisfail Substation when compared to the Base Case.

Figure 1: NPV of Base Case and Credible Network Option



Option 2 has been identified as the preferred network option.

The Base Case is not a credible option, in that it does not allow Powerlink to continue to maintain compliance with relevant standards, applicable regulatory instruments and the Rules. As the investment is classified as a 'reliability corrective action' under the Rules, the purpose of the RIT-T is to identify the credible option that minimises the total cost to customers.

The economic analysis demonstrates that Option 2 has the highest NPV of the two credible options and is therefore the preferred option.

Option 2 involves the full replacement of all secondary systems at Innisfail substation in a new building by December 2024. The indicative capital cost of this option is $11.63 million in 2020/21 prices. Powerlink is the proponent of this network option.

Design work will commence in 2022, with installation and commissioning of the new secondary systems completed by December 2024.

Powerlink welcomes the potential for non-network options to form part or all of the solution

Powerlink welcomes submissions from proponents who consider that they could offer a credible non-network option that is both economically and technically feasible by December 2024, on an ongoing basis.

A non-network option that avoids the proposed replacement of the ageing and obsolete secondary systems would need to replicate, in part or full, the support that Innisfail Substation delivers to customers in the area on a cost effective basis.

Lodging a submission with Powerlink

Powerlink is seeking written submissions on this Project Specification Consultation Report on or before Friday, 5 March 2021, particularly on the credible options presented[6].

Please address submissions to:

Glen Titman
Acting Manager Network and Alternate Solutions
Powerlink Queensland
PO Box 1193
VIRGINIA QLD 4014
Tel: (07) 3860 2328 or email submissions to networkassessments@powerlink.com.au

[6] Powerlink's website has detailed information on the types of engagement activities, which may be undertaken during the consultation process. These activities focus on enhancing the value and outcomes of the RIT-T engagement process for customers and non-network providers.

1 Introduction

1.1 Powerlink Asset Management and Obligations

Powerlink Queensland is a Transmission Network Service Provider (TNSP) in the National Electricity Market (NEM) that owns, develops, operates and maintains Queensland's high-voltage electricity transmission network. This network transfers bulk power from Queensland generators to electricity distributors Energex and Ergon Energy (part of the Energy Queensland Group), and to a range of large industrial customers.

Powerlink's approach to asset management includes a commitment to sustainable asset management practices that ensure Powerlink provides valued transmission services to its customers by managing risk[7], optimising performance and efficiently managing assets through the whole of asset life cycle[8].

Planning studies have confirmed there is a long-term requirement to continue to supply the existing electricity services currently provided by Innisfail Substation to customers in Far North Queensland.

Substation secondary systems broadly perform the functions of transmission element protection, data collection, remote (and local) control and monitoring. At Innisfail, the ageing and obsolete secondary systems are nearing the end of their technical service life and are increasingly at risk of failure, with many items of equipment no longer supported by the manufacturers and limited spares available.

If action is not taken to reduce the risks associated with the supportability of the Innisfail secondary systems by December 2024, Powerlink will be at risk of breaching the Rules requirements for protection availability, and the requirements set down for secondary systems as defined in the AEMO Power System Security Guidelines[9] and the Power System Data Communication Standard[10].

The proposed credible network option in this RIT-T maintains current electricity services to customers in the area by addressing the reduction in availability below mandated standards, arising from faults occurring on Innisfail Substation's ageing and obsolete secondary systems.

1.2 RIT-T Overview

The identified need referred to in this RIT-T to address the risks at Innisfail is not included in the most recent Integrated System Plan (ISP). As such, it is subject to the application and consultation process for RIT-T projects not defined as *actionable ISP projects*[11].

This Project Specification Consultation Report (PSCR) is the first step in the RIT-T process[12]. It:

- describes the reasons why Powerlink has determined that investment is necessary (the 'identified need'), together with the assumptions used in identifying this need, including whether the need is as an actionable project in AEMO's latest Integrated System Plan (ISP)

[7] Risk assessments are underpinned by Powerlink's corporate risk management framework and the application of a range of risk assessment methodologies set out in AS/NZS ISO31000:2018 Risk Management Guidelines.
[8] Powerlink aligns asset management processes and practices with AS ISO55000:2014 Asset Management – Overview, principles and terminology to ensure a consistent approach is applied throughout the life cycle of assets
[9] AEMO, Power System Operating Procedure SO_OP_3715, Power System Security Guidelines, V95, 23 September 2019 (the Rules require AEMO to develop and publish Power System Operating Procedures pursuant to clause 4.10.1(b) of the Rules, which Powerlink must comply with per clause 4.10.2(b))
[10] AEMO, Power System Data Communication Standard, Section 3 Reliability and Section 6 Maintenance, V2, 1 December 2017 (This standard has been made by AEMO under clause 4.11.2(c) of the Rules and incorporates the standards and protocols referred to in clause 4.11.1)
[11] Refer to Clause 5.16.2 of the NER.
[12] This RIT-T consultation has been prepared based on the following documents: National Electricity Rules, Version 146, 6 August 2020 and AER, Regulatory investment test for transmission application guidelines, August 2020

- provides potential proponents of non-network options with information on the technical characteristics that a non-network solution would need to deliver, in order to assist proponents in considering whether they could offer an alternative solution
- describes the credible option that Powerlink currently considers may address the identified need
- discusses why Powerlink does not expect specific categories of market benefit to be material for this RIT-T[13]
- presents the NPV assessment of the credible option compared to a Base Case (as well as the methodologies and assumptions underlying these results)
- identifies and provides a detailed description of the credible option that best satisfies the RIT-T, and is therefore the preferred option
- describes how customers and stakeholders have been engaged with regarding the identified need
- provides stakeholders with the opportunity to comment on this assessment so that Powerlink can refine the analysis (if required)

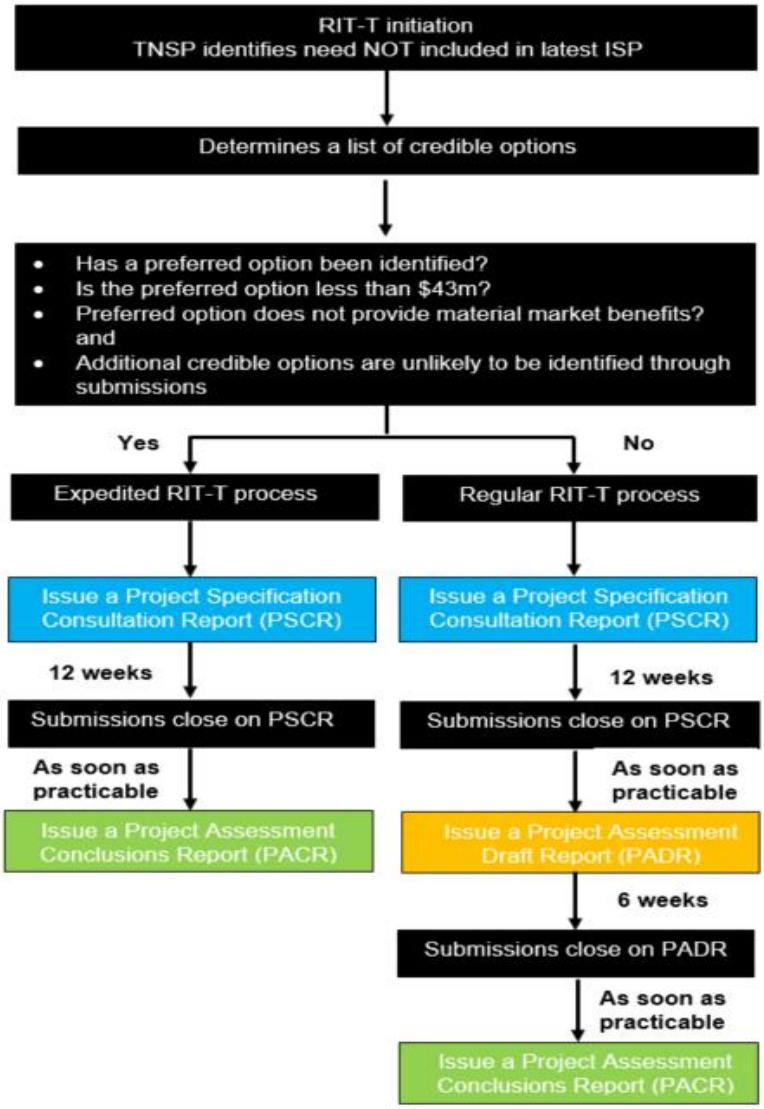
Powerlink has adopted the expedited process for this RIT-T, as allowed for under the National Electricity Rules (the Rules) for investments of this nature[14]. Specifically, Powerlink will publish a Project Assessment Conclusions Report (PACR) following public consultation on this PSCR and apply the exemption from publishing a Project Assessment Draft Report (PADR) as:

- the preferred option has an estimated capital cost of less than $43 million
- none of the credible options have material market benefits, other than benefits associated with changes in involuntary load shedding[15]
- Powerlink has identified its preferred option in this PSCR (together with the supporting quantitative cost benefit analysis)
- Powerlink does not envisage that additional credible options, which could deliver material market benefits, will be identified through the submission process, given the nature of this primary plant replacement project.

Powerlink will however publish a PADR if submissions to this PSCR identify other credible options that have not yet been considered and which could provide a more cost efficient outcome for customers.

[13] As required by clause 5.16.1(c)(iv) of the Rules.
[14] In accordance with clause 5.16.4(z1) of the Rules
[15] Section 4.3 Project assessment draft report, Exemption from preparing a draft report, AER, *Application guidelines, Regulatory investment test for transmission,* December 2018

Figure 1.1: RIT-T Process Overview for projects that are not *actionable ISP projects*



2 Customer and non-network engagement

With five million Queenslanders and 236,000 Queensland businesses depending on Powerlink's performance, Powerlink recognises the importance of engaging with a diverse range of customers and stakeholders who have the potential to affect, or be affected by, Powerlink activities and/or investments. Together with our industry counterparts from across the electricity and gas supply chain, Powerlink has committed to The Energy Charter.

2.1 Powerlink takes a proactive approach to engagement

Powerlink regularly hosts a range of engagement forums and webinars, sharing effective, timely and transparent information with customers and stakeholders within the broader community.

Powerlink's annual Transmission Network Forum (TNF) is a primary vehicle used to engage with the community, understand broader customer and industry views and obtain feedback on key topics.

It also provides Powerlink with an opportunity to further inform its business network and non-network planning objectives. TNF participants include customers, landholders, environmental groups, Traditional Owners, government agencies, and industry bodies.

Engagement activities such as the TNF help inform the future development of the transmission network and assist Powerlink in providing services that align with the long-term interests of customers. Feedback from these activities is also incorporated into a number of publicly available reports.

2.2 Working collaboratively with Powerlink's Customer Panel

Powerlink's Customer Panel provides a face-to-face opportunity for customers and consumer representative bodies to give their input and feedback about Powerlink's decision making, processes and methodologies. It also provides Powerlink with a valuable avenue to keep customers and stakeholders better informed, and to receive feedback about topics of relevance, including RIT-Ts.

The Customer Panel is regularly advised on the publication of Powerlink's RIT-T documents and briefed quarterly on the status of current RIT-T consultations, as well as upcoming RIT-Ts, providing an ongoing opportunity for:

- the Customer Panel to ask questions and provide feedback to further inform RIT-Ts
- Powerlink to better understand the views of customers when undertaking the RIT-T consultation process.

Powerlink will continue providing updates to and request input from the Customer Panel throughout the RIT-T consultation process.

2.3 Transparency on future network requirements

Powerlink's annual planning review findings are published in the TAPR and TAPR templates, providing early information and technical data to customers and stakeholders on potential transmission network needs over a 10-year outlook period. The TAPR plays an important part in planning Queensland's transmission network and helping to ensure it continues to meet the needs of Queensland electricity consumers and participants in the NEM. Powerlink undertakes engagement activities, such as a webinar and/or forum, to share with customers and stakeholders the most recent TAPR findings and respond to any questions that may arise.

In addition, beyond the defined TAPR process, Powerlink's associated engagement activities provide an opportunity for non-network alternatives to be raised, further discussed or formally submitted for consideration as options to meet transmission network needs, well in advance of the proposed investment timings and commencement of regulatory consultations (where applicable).

2.4 Addressing the secondary systems condition risks at Innisfail Substation

Powerlink identified in its TAPRs 2019 and 2020, an expectation that action would be required on the Innisfail Substation secondary systems to maintain reliability of supply in the Far North transmission zone[16].

Powerlink advised members of its Non-network Engagement Stakeholder Register (NNESR) of the publication of the TAPR.

No submissions proposing credible and genuine non-network options have been received from prospective non-network solution providers in the normal course of business, in response to the publication of TAPRs or as a result of stakeholder engagement activities.

2.5 Powerlink applies a consistent approach to the RIT-T stakeholder engagement process

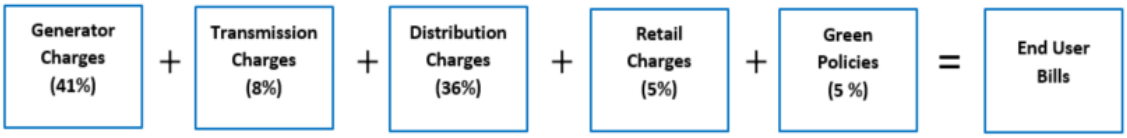
Powerlink undertakes a considered and consistent approach to ensure an appropriate level of stakeholder engagement is undertaken for each individual RIT-T. Please visit Powerlink's website for detailed information on the types of engagement activities that may be undertaken during the consultation process.

These activities focus on enhancing the value and outcomes of the RIT-T process for customers, stakeholders and non-network providers. Powerlink welcomes feedback from all stakeholders to further improve the RIT-T stakeholder engagement process.

2.6 The transmission component of electricity bills

Powerlink's contribution to electricity bills reduced by a third from July 2017 and comprises approximately 8% of the total cost of the residential electricity bill (refer to Figure 2.1).

Figure 2.1: Components of end user bills



Detailed information on transmission pricing, including discussion on how Powerlink is actively engaging with customers and stakeholders on transmission pricing concerns, is available on Powerlink's website.

3 Identified need

This section provides an overview of the existing arrangements at Innisfail Substation and describes the increasing risk to Powerlink being unable to maintain compliance with relevant standards, applicable regulatory instruments and the Rules, which are designed to ensure Powerlink's customers continue to receive safe, reliable and cost effective electricity services.

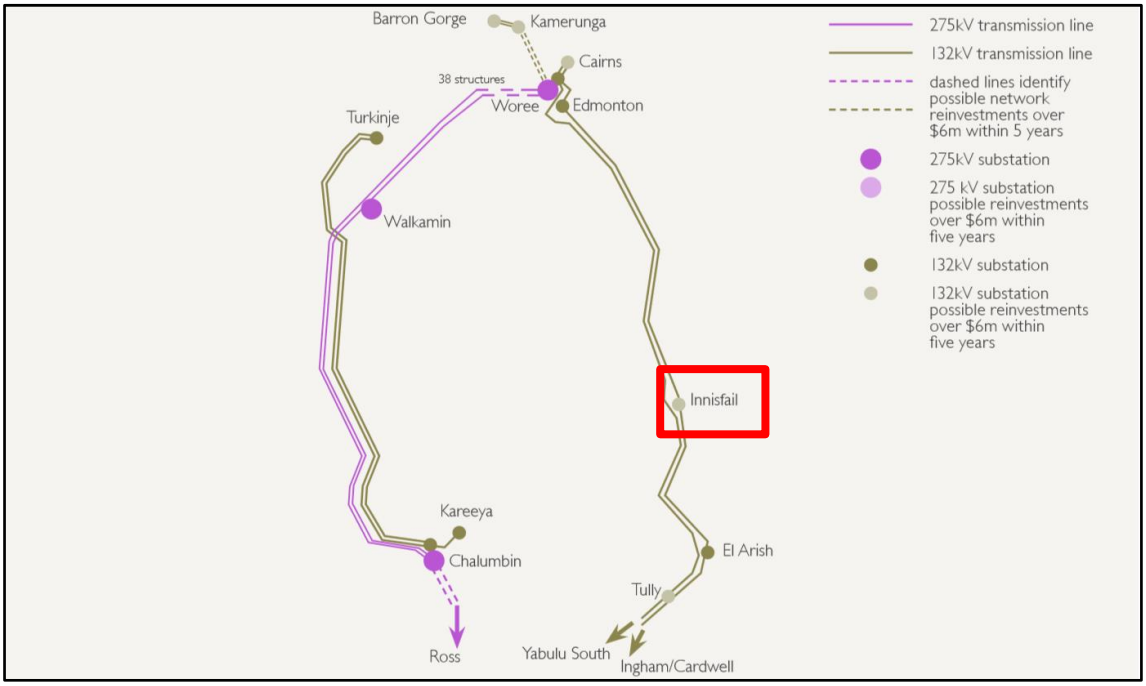
3.1 Geographical and network need

Innisfail Substation is located approximately 70 kilometres south east of Cairns in Far North Queensland (FNQ). The site was originally established in the late 1950s as part of the Kareeya Hydro Power Station project to provide electricity to coastal communities in the area. It continues today as a 132/22kV bulk supply point for Energy Queensland's distribution network for the Innisfail area and forms part of the 132kV coastal network servicing Far North Queensland.

Planning studies have confirmed there is an enduring need for the supply of bulk electricity to the Innisfail area. The Far North transmission network is shown in Figure 3.1.

[16] This relates to the standard geographic definitions (zones) identified within the TAPR.

Figure 3.1: Far North transmission network



3.2 Description of identified need

Powerlink's Transmission Authority requires it to plan and develop the transmission network "in accordance with good electricity industry practice, having regard to the value that end users of electricity place on the quality and reliability of electricity services". It allows load to be interrupted during a critical single network contingency, provided the maximum load and energy:

- will not exceed 50MW at any one time; or
- will not be more than 600MWh in aggregate[17].

Planning studies have confirmed that in order to continue to meet the reliability standard within Powerlink's Transmission Authority, the services currently provided by Innisfail Substation are required into the foreseeable future to meet ongoing customer requirements.

Schedule 5.1 of the Rules sets minimum standards for network service providers on the availability and operation of protection systems. Schedule 5.1.9 (c) specifically requires Powerlink provide sufficient primary and back-up protection systems (including breaker-fail protection systems) to ensure that a fault is automatically disconnected[18]. The ageing and obsolete secondary systems at Innisfail are nearing the end of their technical service lives and are increasingly at risk of failure, with many items of equipment no longer supported by the manufacturers and limited spares available. Increasing failure rates, along with the increased time to rectify the faults due to equipment obsolescence, significantly affects the availability and reliability of these systems.

There is a need for Powerlink to address this emerging risk to ensure ongoing compliance with Schedule 5.1 of the Rules, relevant standards and applicable regulatory instruments, which are designed to ensure Powerlink's customers continue to receive safe, reliable and cost effective electricity services.

As the proposed investment is for meeting reliability and service standards arising from Powerlink's Transmission Authority and to ensure Powerlink's ongoing compliance with Schedule 5.1 of the Rules, it is a 'reliability corrective action' under the Rules[19].

[17] Transmission Authority No. T01/98, section 6.2(c)
[18] The Rules Schedule 5.1.9(c)
[19] The Rules clause 5.10.2 ,Definitions, reliability corrective action

A reliability corrective action differs from that of an increase in producer and consumer surplus (market benefit) driven need in that the preferred option may have a negative net economic outcome because it is required to meet an externally imposed obligation on the network business.

3.3 Assumptions and requirements underpinning the identified need

The secondary systems at Innisfail Substation broadly perform the functions of transmission element protection, data collection, remote (and local) control and monitoring. In performing these functions, secondary systems:

- protect the public, the environment, the transmission network and substation primary plant from damage due to faults or mal-operation
- allow remote and local automatic or manual control of primary plant
- enable the remote and local monitoring of primary and secondary plant and equipment.

Protection systems are critical to the safe and effective operation of the transmission network with the Electricity Act 1994 requiring Powerlink to:

> *"operate, maintain (including repair and replace if necessary) and protect its transmission grid to ensure the adequate, economic, reliable and safe transmission of electricity"*[20].

The Rules place specific requirements on Powerlink as a Transmission Network Service Provider (TNSP) to:

> *"Provide sufficient primary protection systems and back-up protection systems (including breaker fail protection systems) to ensure that a fault of any fault type anywhere on its transmission system or distribution system is automatically disconnected"*[21].

The importance of protection systems is further reinforced in the Rules, which require TNSPs to ensure:

> "*all protection systems for lines at a voltage above 66 kV, including associated intertripping, are well maintained so as to be available at all times other than for short periods (not greater than eight hours) while the maintenance of a protection system is being carried out"*[22].

As required by the Rules[23], AEMO has published the Power System Security Guidelines (PSS Guidelines) to clarify the Rules regarding unplanned outages of the protection systems. In the event of an unplanned outage of a secondary system, AEMO's PSS Guidelines require that the primary network assets be taken out of service if the fault cannot be rectified within 24 hours[24]. Both the Rules and the AEMO PSS Guidelines indicate that exceeding 24 hours to rectify a protection fault is not appropriate good practice given the importance of protection systems, obligating Powerlink to take action to ensure the restoration period of unplanned outages of secondary systems does not reasonably exceed 24 hours.

Similar to protection requirements, AEMO's Power System Data Communication Standard specifies that the total period of critical outages over a 12 month period must not exceed 24 hours for remote control and monitoring functions[25]. This relates to both the reliability of the equipment (i.e. how often the device fails) and the repair time. It follows that the repair time for any single fault on this equipment must not exceed 24 hours if there are no other faults during the 12 month period.

[20] Electricity Act 1994 (Queensland), Chapter 2, Part 4, S34(1)(a)
[21] The Rules clause S5.1.9(c)
[22] The Rules clause S5.1.2.1 (d)
[23] The Rules clause 4.11.2 (c)
[24] AEMO, Power System Operating Procedure SO_OP_3715, Power System Security Guidelines, V95, 23 September 2019 (the Rules require AEMO to develop and publish Power System Operating Procedures pursuant to clause 4.10.1(b) of the Rules, which Powerlink must comply with per clause 4.10.2(b)).
[25] AEMO, Power System Data Communication Standard, Section 3 Reliability and Section 6 Maintenance, V2, 1 December 2017 (This standard has been made by AEMO under clause 4.11.2(c) of the Rules and incorporates the standards and protocols referred to in clause 4.11.1)

Powerlink must therefore plan (have systems and processes in place) to safely resolve all protection, remote control and monitoring system problems and defects within 24 hours.

Analysis has shown that operating a secondary system beyond 20 years of effective age significantly impacts its ability to perform within acceptable limits[26]. Delaying replacement of secondary system assets beyond this optimal 20 year timeframe places the network at risk due to the limited supply of suitable spares, which prolongs the duration of any emergency corrective maintenance associated with replacing failed obsolete components beyond the 24 hour limit. In the case of protection systems, extended outages beyond 24 hours will result in the need to switch out network assets, placing the supply of electricity to customers at risk[27].

With an increasing likelihood of faults and longer rectification periods arising from the ageing and obsolete secondary systems remaining in service at Innisfail Substation, Powerlink must undertake reliability corrective action if it is to continue to meet its jurisdictional obligations and the standards for reliability of supply set out by AEMO and in the Rules.

3.4 Description of asset condition and risks

Powerlink has undertaken a comprehensive condition assessment of the secondary systems at Innisfail Substation using an asset health index modelled from zero to ten, where zero represents new assets and ten indicates that the asset requires urgent action to address the increasing risk of unavailability and unreliable operation. This has identified that a number of secondary systems at Innisfail are reaching the end of their technical service lives.

The condition of the at-risk secondary systems at Innisfail Substation is summarised in Table 3.1.

Table 3.1: Innisfail at-risk secondary systems

Bay	Construction year	Health index range (average)
2x Transformer Bays Protection and Control	2004 - 2014	4.0 – 7.3 (6.5)
2x Feeder Bays Protection and Control	2003 - 2007	5.3– 7.3 (7.1)
1x Capacitor Bay Protection and Control	2003	7.3
1x Bus Coupler Protection and Control	2003	7.3
2x Bus Zones Protection and Control	2003-2007	6.9-7.3 (7.2)
Metering 2x Transformers	1999	8.9
Non Bay Station Panel (Remote Terminal Units) DC Distribution Board, SCADA, OpsWAN	2003 - 2017	7.05 – 9.2 (7.6)

Most of the secondary systems at Innisfail were installed in 2003 as part of a system upgrade. There have also been a number of selective secondary system component installations in later years as part of remote end protection upgrades and faulty relay replacements, thereby

[26] Cigre, Study Committee B3, Paper B3_205_2018, “Modelling Substation Control and Protection Asset Condition for Optimal Reinvestment Decision Based on Risk, Cost and Performance” by T. Vu, M. Pelevin, D. Gibbs, J. Horan, C. Zhang (Powerlink Queensland)

[27] AEMO, Power System Operating Procedure SO_OP_3715, Power System Security Guidelines, clause 13.3, V95, 23 September 2019

reducing the average health index, meaning the majority of equipment has a health index higher than the average given in Table 3.1.

The impact of equipment obsolescence is an important consideration when determining if remedial action is required. Taking into account the most recent analysis of the Innisfail secondary systems condition and the increasing equipment obsolescence, this equipment is now currently expected to be unsupportable beyond December 2024.

Notwithstanding the assessed condition of the asset, Powerlink's ongoing operational maintenance practices are designed to monitor equipment condition and ensure any emerging safety risks are proactively managed.

3.5 Consequences of failure in an obsolete system

The duration of a fault is not only dependent on the nature and location of the fault, but also on the availability of a like-for-like replacement of the failed component. If a like-for-like replacement is available (i.e. same hardware and firmware as the failed device), then the replacement is often not complex and can generally be rectified within the timeframes specified by AEMO. If a like-for-like replacement is not available, then replacement is operationally and technically more complex due to:

- physical differences with the mounting and installation
- development and testing of new configurations and settings
- cabling, connectivity and protocol differences
- interoperability between other devices on site, and with remote ends (if applicable)
- non-standard settings / configuration requirements
- legislative requirements for professional engineering certification

All of these complexities add time to the fault resolution, typically resulting in a fault duration well in excess of 24 hours.

Given the specific nature of the Rules' obligations and the AEMO requirements relating to protection, control and monitoring systems, accepted good industry practice is often to replace the current ageing and obsolete secondary systems when they reach the end of their technical service lives, rather than letting them run to failure. Due to the condition and obsolescence issues with the secondary systems at Innisfail, there is a significant risk of breaching the mandated obligations and requirements if the at risk secondary systems are left to operate beyond December 2024.

A summary of the equipment condition issues and associated possible consequences of failure of the equipment is given in Table 3.2.

Table 3.2: Summary of equipment condition issues and potential consequences of failure

Equipment	Condition/Issue	Potential consequence of failure
Protection and Control for High Voltage Bay	• Obsolescence and limited availability of spares; no longer supported by the manufacturer • Increasing failure rates due to ageing electronic components	• Failure to operate or slow clearance resulting in Rules violation, plant damage, safety and supply risks • Prolonged outages of equipment placing load at risk and resulting in less reliable supply to customers • Unable to comply with AEMO's Power System Data Communication Standard • Unable to comply with AEMO's Power System Security Guidelines

Equipment	Condition/Issue	Potential consequence of failure
		• Increased failures resulting in less reliable supply to customers
Metering Equipment	• Obsolescence and limited availability of spares; no longer supported by the manufacturer • Increasing failure rates due to ageing electronic component	• Unable to restore metering installation upon malfunction within the 2 business day requirement of the Rules[28]
SCADA System	• Obsolescence and limited availability of spares; no longer supported by the manufacturer • Increasing failure rates due to ageing electronic components	• Unable to comply with AEMO's Power System Data Communication Standard • Increased failures resulting in less reliable supply to customers

3.5.1 Fleet-wide implications of obsolescence

In addition to the site specific impacts of obsolescence at Innisfail Substation, it is also important to note the compounding impact of equipment obsolescence occurring across the fleet of secondary systems assets installed in the Powerlink network. When a particular equipment type or model is no longer supported by the manufacturer, and limited spares are available to service the fleet of assets, running multiple secondary systems to failure across the network increases the likelihood of concurrent systemic faults that would overwhelm Powerlink's capacity to undertake corrective maintenance or replacement projects. This would leave Powerlink in breach of the Rules, the AEMO standards and its jurisdictional obligations.

4 Required technical characteristics for non-network options

Due to the nature of secondary systems, Powerlink believes that it is unlikely for there to be an economically and technically feasible non-network option. However, Powerlink welcomes submissions from proponents who consider that they could offer a non-network solution in full or in part by December 2024 on an ongoing basis, and will investigate the feasibility of any potential non-network option proposed or otherwise identified.

This PSCR provides a further opportunity for providers of feasible non-network options to submit details of their proposals for consideration.

4.1 Criteria for proposed network support services

Innisfail provides voltage support to the local Innisfail area. Potential non-network solutions would need to provide supply to the 22kV network at Innisfail of up to a peak of 27MW, and up to a 550MWh per day on a continuous basis. This would facilitate the removal of Innisfail Substation and connection of the Innisfail to Tully transmission line to the Innisfail to El Arish transmission line.

The location(s) of any proposed non-network solution will determine the exact levels of support required and be considered on a case by case basis.

Powerlink has identified the following common criteria that must be satisfied if proposed network support services are to meet supply requirements[29].

Size and location

- Proposed solutions must be large enough, individually or collectively, to provide the size of injection or demand response set out above. However, the level of support is dependent on the location, type of network support and load forecasts.

[28] The Rules, clause 7.8.10 Metering installation malfunctions

[29] Powerlink's Network Support Contracting Framework has been developed as a general guide to assist potential non-network solution providers. This framework outlines the key contracting principles that are likely to appear in any non-network support agreement.

- Due to the bulk nature of the transmission network, aggregation of sub 10MW non-network solutions will be the sole responsibility of the non-network provider.
- Notwithstanding the location of any solution, each proposal would require assessment in relation to technical constraints pertinent to the network connection, such as impacts on intra-regional transfer limits, fault level, system strength, maintaining network operability and quality of supply.

Operation

- A non-network option would need to be capable of operating continuously 24 hours per day over a period of years.
- If a generation service is proposed (either standalone or in conjunction with other services), such operation will be required regardless of the market price[30].
- Proponents of generation services are advised that network support payments are intended for output that can be demonstrated to be additional to the plant's normal operation in the NEM.
- Where there are network costs associated with a proposed non-network option, including asset decommissioning, these costs will form part of the option economic assessment.

Reliability

- Proposed services must be capable of reliably meeting electricity demand under a range of conditions and, if a generator must meet all relevant National Electricity Rules requirements related to grid connection.
- Powerlink has obligations under the National Electricity Rules, its Transmission Authority and connection agreements to ensure supply reliability is maintained to its customers. Failure to meet these obligations may give rise to liability. Proponents of non-network options must also be willing to accept any liability that may arise from its contribution to a reliability of supply failure.

Timeframe and certainty

- Proposed services must be able to be implemented in sufficient time to meet the identified need, using proven technology and, where not already in operation, provision of information in relation to development status such as financial funding and development timeline to support delivery within the required timeframe must be provided.

Duration

- The agreement duration for any proposed service will provide sufficient flexibility to ensure that Powerlink is pursuing the most economic long run investment to address the condition and obsolescence risks at Innisfail Substation.

Powerlink welcomes submissions from potential proponents who consider that they could offer a credible non-network option that is both economically and technically feasible.

5 Potential credible network options to address the identified need

Secondary systems have a very specific and important role in protecting, controlling and monitoring the transmission network, with the form and capabilities of much of these systems defined in the Rules and the AEMO standards and guidelines. Consequently, the only technically and economically prudent network option to address the secondary system condition risks and compliance obligations at Innisfail Substation by December 2024 is to replace the secondary systems.

Powerlink has developed two credible network options to address the secondary systems' condition risks and compliance obligations at Innisfail Substation.

[30] The National Electricity Rules prevent a generator that is providing network support from setting the market price.

- Option 1: In-situ replacement of the all secondary systems in new panels in the existing building by December 2024. This option seeks to optimise the use of the existing building's infrastructure and includes the cost to mitigate the presence of asbestos in parts of the building.
- Option 2: Replacement of all secondary systems in a new building by December 2024. This option seeks to minimise mobilisation costs and outages by completing the initial fit-out and acceptance testing of the secondary systems in a new modular building constructed off-site, before re-locating the entire building to the substation.

Details of the options are given in Tables 5.1 and 5.2 below.

Table 5.1: Summary Option 1

Option 1	Description	Indicative cost ($m) 2020/21	Annual O&M Costs ($m) 2020/21
RIT - Project			
Replacement of all secondary systems using new panels within the existing building by December 2024*	Replacement of the following protection, control and monitoring systems in the existing building: • 2x Transformer bays • 2x Feeder bays • 1x Capacitor Bank bay • 1x bus coupler bay • 1x Bus Zone • All RTUs • All OpsWAN equipment Plus • Install new meters on 2x Transformers • Upgrade SCADA links • Retain Power Quality Monitoring	12.90	0.024
TOTAL		**12.90**	**0.024**

Table 5.2: Summary Option 2

Option 2	Description	Indicative cost ($m) 2019/20	Annual O&M Costs ($m) 2019/20
RIT - Project			
Replacement of all secondary systems into a new building by December 2024	Replacement of the following protection, control and monitoring systems in the existing building: • 2x Transformer bays • 2x Feeder bays • 1x Capacitor Bank bay • 1x bus coupler bay • 1x Bus Zone • All RTUs • All OpsWAN equipment • Power Quality Monitoring panel Plus • Install new meters on 2x Transformers • Upgrade SCADA links • Remove and retain existing Power Quality Monitoring device	11.63	0.026 (Includes nominal maintenance of existing building.)
TOTAL		**11.63**	**0.026**

The proposed credible network options addresses the major risks resulting from the deteriorating condition of ageing and obsolete secondary systems at Innisfail Substation, allowing Powerlink to meet its reliability of supply and safety obligations under its Transmission Authority and the Electricity Act 1994, through replacement of the deteriorated protection and control systems and associated equipment. Similarly, the replacement of the at-risk secondary systems equipment will enable Powerlink to meet the specified requirements of protection, control and monitoring systems stated in the Rules and the AEMO standards and guidelines.

5.1 Material inter-network impact

Powerlink does not consider that the credible option under consideration will have a material inter-network impact, based on AEMO's screening criteria[31].

6 Materiality of market benefits

The rules require that all categories of market benefits identified in relation to a RIT-T be quantified, unless the TNSP can demonstrate that a specific category is unlikely to be material.

6.1 Market benefits that are material for this RIT-T assessment

Powerlink considers that changes in involuntary load shedding (i.e. the reduction in expected unserved energy), may affect the comparison of the credible option under consideration to the Base Case and that this class of market benefit could be material. These benefits have been quantified and included within the cost benefit and risk cost analysis as network risk.

[31] In accordance with Rules clause 5.16.4(b)(6)(ii). AEMO has published guidelines for assessing whether a credible option is expected to have a material inter-network impact.

6.2 Market benefits that are not material for this RIT-T assessment

The AER has recognised a number of classes of market benefits may not be material in the RIT-T assessment and so do not need to be estimated[32].

A discussion of each market benefit under the RIT-T that is considered not material is presented below:

- **changes in patterns of generation dispatch**: replacement of secondary systems by itself does not affect transmission network constraints or affect transmission flows that would change patterns of generation dispatch. It follows that changes through different patterns of generation dispatch are not material to the outcome of the RIT-T assessment.
- **changes in voluntary load curtailment**: a secondary systems fault by itself does not affect prices in the wholesale electricity market. It follows that changes in voluntary load curtailment will not be material for the purposes of this RIT-T.
- **changes in costs for other parties**: the effects of replacing secondary systems under the credible option considered is localised to the substation they are located at and do not affect the capacity of transmission network assets and therefore are unlikely to change generation investment patterns (which are captured under the RIT-T category of 'costs for other parties').
- **differences in the timing of expenditure**: the credible option of secondary systems replacement does not affect the capacity of transmission network assets, the way they operate, or transmission flows. Accordingly, differences in the timing of expenditure of unrelated transmission investments are unlikely to be affected.
- **changes in network losses**: the credible option is not expected to provide any changes in network losses as replacing secondary systems does not affect the characteristics of primary transmission assets.
- **changes in ancillary services cost**: there is no expected change to the costs of Frequency Control Ancillary Services (FCAS), Network Control Ancillary Services (NCAS), or System Restart Ancillary Services (SRAS) due to the credible option under consideration. These costs are therefore not material to the outcome of the RIT-T assessment.
- **competition benefits:** Powerlink does not consider that of the credible option will materially affect competition between generators, and generators' bidding behaviour and, consequently, considers that the techniques required to capture any changes in such behaviour would involve a disproportionate level of effort compared to the additional insight it would provide.
- **option value**: Powerlink does not consider that the identified need for the option considered in this RIT-T is affected by uncertain factors about which there may be more clarity in future. As a consequence, option value is not a relevant consideration for this RIT-T.

6.3 Consideration of market benefits for non-network options

Powerlink notes that non-network options may impact the wholesale electricity market (for example by displacing generation output). Accordingly, it is possible that several of the above classes of market benefits will be material where there are credible non-network options, depending on the specific form of the option.

Where credible non-network options are identified as part of the consultation process on this PSCR, Powerlink will assess the materiality of market benefits associated with these options. Where the market benefits are considered material, these will be quantified as part of the RIT-T assessment of these options.

[32] AER, Regulatory investment test for transmission application guidelines, August 2020

7 Base Case

7.1 Modelling a Base Case under the RIT-T

Consistent with the RIT-T Application Guidelines the assessment undertaken in this PSCR compares the costs and benefits of the credible option developed to address the risks arising from an identified need, with a Base Case[33].

As characterised in the RIT-T Application Guidelines, the Base Case itself is not a credible option to meet the identified need. Specifically, the Base Case reflects a state of the world in which the condition and obsolescence issues arising from the ageing assets are only addressed through standard operational activities, with escalating safety, financial, environmental and network risks.

To develop the Base Case, the existing condition and obsolescence issues are managed by undertaking operational maintenance only, which results in an increase in risk levels as the condition and availability of the asset deteriorates over time. These increasing risk levels are assigned a monetary value that is used to evaluate the credible options designed to offset or mitigate these risk costs.

The Base Case for Innisfail secondary systems therefore includes the costs of work associated with operational maintenance and the risk costs associated with the failure of the assets. The costs associated with equipment failures are modelled in the risk cost analysis and are not included in the operational maintenance costs.

The Base Case provides a clear reference point in the cost-benefit analysis to compare any credible options (network or non-network) against each other.

7.2 Innisfail Base Case risk costs

Powerlink has developed a risk modelling framework consistent with the RIT-T Application Guidelines and the AER Industry practice application note[34].

An overview of the framework is available on Powerlink's website[35] and the principles of the Framework have been used to calculate the risk costs of the Innisfail Base Case. The framework includes the modelling methodology and general assumptions underpinning the analysis.

7.3 Base Case assumptions

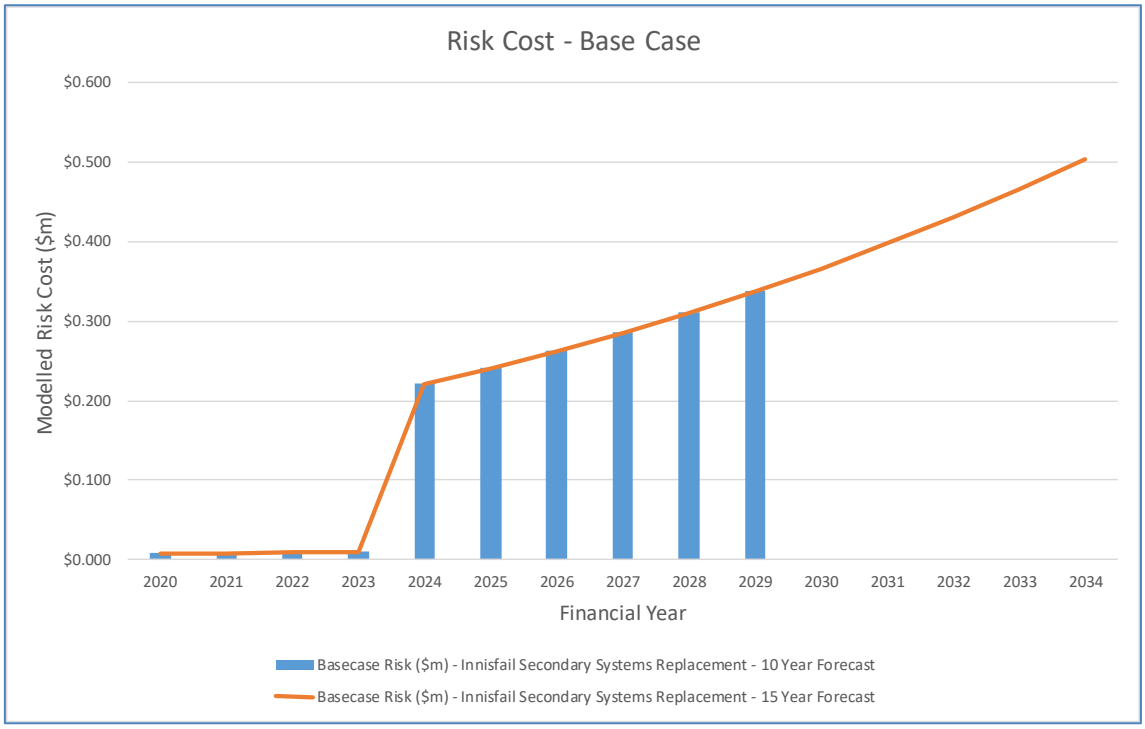
In calculating the potential unserved energy (USE) arising from a failure of the ageing and obsolete secondary systems at Innisfail substation, the following modelling assumptions have been made:

- Spares for secondary system items have been assumed to be available prior to the point of expected spares depletion. After this point the cost and time to return the secondary system back to service increases significantly;
- Historical load profiles have been used when assessing the likelihood of unserved energy under concurrent failure events;
- Due to the network and substation configuration, unserved energy generally accrues under concurrent failure events and consideration has been given to potential feeder trip events within the wider coastal far north Queensland area;
- Innisfail substation supplies a mixture of residential, agricultural (sugar cane farming) and commercial loads. Historical load data and estimates have been used to analyse the proportion of these load types, and a weighted average VCR of $32,041/MWh has been used when evaluating network risk cost; and
- VCRs for residential, agricultural and industry load types within the relevant climate zone published within the AER's 2019 Value of Customer Reliability Review Final Report have been used within this risk cost assessment.

[33] AER, Regulatory investment test for transmission application guidelines, August 2020
[34] AER Industry practice application note, Asset Replacement Planning, January 2019
[35] The risk costs are calculated using the principles set out in the Powerlink document, Overview of Asset Risk Cost Methodology, May 2019

The 15 year forecast of risk costs for the Base Case is shown in Figure 7.1.

Figure 7.1: Modelled Base Case risk costs



The risk cost model meets the operational requirements of the NER and AEMO's System Security Guidelines. Under these requirements, the relevant network element will be taken out of service if the failed secondary system cannot be restored within a 24 hour period. The safety and environmental risks are significantly lowered under this modelling approach, and have not been incorporated within the risk cost assessments.

Based upon the assessed condition of the ageing secondary systems at Innisfail, the risk costs are projected to increase from $0.008 million in 2020 to $0.504 million in 2034. The main base case risks for the secondary systems at Innisfail substation are associated with financial risks to replace the failed secondary systems in an unplanned (emergency) manner, and network risks (unserved energy) resulting from concurrent network outages associated with equipment failures.

These risks and associated costs increase over time as the condition of equipment further deteriorates, more equipment becomes obsolete and the likelihood of failure rises.

7.4 Modelling of risk in the network option

Each option is scoped to manage the major risks arising in the Base Case and to maintain compliance with all statutory requirements, the Rules and AEMO standards. The residual risk is calculated for each option based upon the individual implementation strategy of the option. This is included with the capital and operational maintenance cost of each option to develop the NPV inputs.

8 General modelling approach adopted for net benefit analysis

8.1 Analysis period

The RIT-T analysis has been undertaken over a 15 year period, from 2020 to 2034. A 15 year period takes into account the size and complexity of the secondary system replacement option.

There will be remaining asset life by 2034, at which point a terminal value[36] is calculated to account for any future benefits that would accrue over the balance of the asset's life.

8.2 Discount rate

Under the RIT-T, a commercial discount rate is applied to calculate the NPV of the costs and benefits of credible options. Powerlink has adopted a real, pre-tax commercial discount rate of 5.90%[37] as the central assumption for the NPV analysis presented in this report.

Powerlink has tested the sensitivity of the results to changes in this discount rate assumption, and specifically to the adoption of a lower bound discount rate of 3.47%[38] and an upper bound discount rate of 8.33% (i.e. a symmetrical upwards adjustment).

8.3 Description of reasonable scenarios and sensitivities

The RIT-T analysis is required to incorporate a number of different reasonable scenarios, which are used to estimate market benefits and rank options. The number and choice of reasonable scenarios must be appropriate to the credible options under consideration and reflect any variables or parameters that are likely to affect the ranking of the credible options, where the identified need is reliability corrective action[39].

8.3.1 Reasonable Scenarios

The detailed market modelling of future generation and consumption patterns represents a disproportionate cost in relation to the scale of the proposed network investment, and will not materially impact the ranking of options.

Given the specific and localised nature of the secondary systems' issue, the ISP scenarios from the most recent Input Assumptions and Scenario Report are also not relevant to this RIT-T[40].

Consistent with the requirements for reasonable scenarios in the RIT-T instrument [41] and in accordance with the provisions of the RIT-T Application Guidelines[42], Powerlink has considered capital cost and discount rate sensitivities individually and in combination and has found that these variables do not affect the relative ranking of the credible options or the identification of the preferred option. As sensitivities do not affect ranking results, Powerlink has elected to present the one central scenario in Table 8.1.

Table 8.1: Reasonable scenario assumed

Key variable/parameter	Central scenario
Capital costs	100% of central capital cost estimate
Discount rate	5.90%

[36] Terminal value was calculated based on remaining asset value using straight-line depreciation over the capital asset life.
[37] This commercial discount rate on is based on AEMO's **2019** forecasting and planning scenarios, inputs, and assumptions report in accordance with AER, RIT-T, August 2020 paragraphs 18-19 .
[38] A discount rate of 3.47% is based on the AER's Final Decision for Powerlink's 2017-2022 transmission determination, which allowed a nominal vanilla WACC of 6.0% and forecast inflation of 2.45% that implies a real discount rate of 3.47%. See AER, Final Decision: Powerlink transmission determination 2017-2022 | Attachment 3 – Rate of return, April 2017, p 9.
[39] AER, Regulatory investment test for transmission, August 2020, Section 23
[40] AER, Final: RIT–T, August 2020, sub-paragraph 20(b)
[41] AER, Regulatory investment test for transmission, August 2020, Section 22
[42] S3.8.1 Selecting reasonable scenarios, RIT-T Application Guidelines, August 2020

9 Cost benefit analysis and identification of the preferred option

9.1 NPV Analysis

Table 9.1 outlines the NPV of the credible network options **relative** to the Base Case.

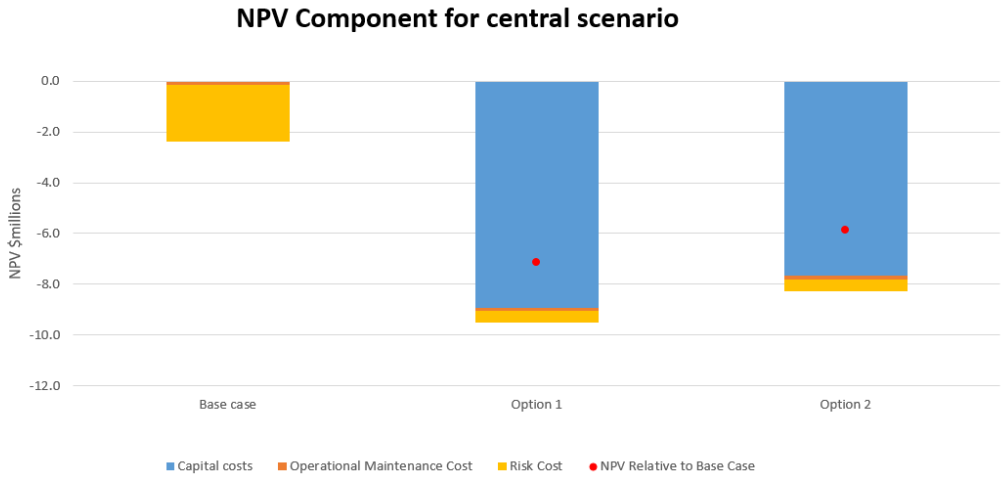
Table 9.1: NPV of the credible network options relative to the Base Case ($m, 2020/21)

Option	Description	Central Scenario NPV relative to Base Case ($m)	Ranking
1	Replacement of all secondary systems using new panels within the existing building by December 2024	-7.12	2
2	Replacement of all secondary systems into a new building by December 2024	-5.86	1

Both credible network options address the identified need on an enduring basis by replacing the deteriorated and obsolete assets. Option 2 is ranked first, with Option 1 being $1.26m more expensive compared to Option 2 in NPV terms.

Figure 9.1 sets out the breakdown of capital cost, operational maintenance costs and risk costs of the credible options in NPV terms under the central scenario and illustrates that both the credible options will reduce the risk cost compared to the Base Case. Note that the non-credible Base Case consists of operational maintenance and risk costs and does not include any capital expenditure.

Figure 9.1: NPV of the Base Case and credible options (NPV $m, 2020/21)



9.2 Sensitivity analysis

Powerlink has investigated the following sensitivities on key assumptions:

- a range from 3.47% to 8.33% discount rate
- a range from 75% to 125% of base capital expenditure estimates.
- a range from 75% to 125% of base maintenance expenditure estimates.
- a range from 75% to 125% of base risk cost estimates.

Figures 9.2 to 9.5 show that varying the discount rate, capital expenditure, risk cost and operational maintenance expenditure has no impact on the identification of the preferred option. Option 2 is the preferred option under all scenarios tested.

Figure 9.2: Discount Rate Sensitivity

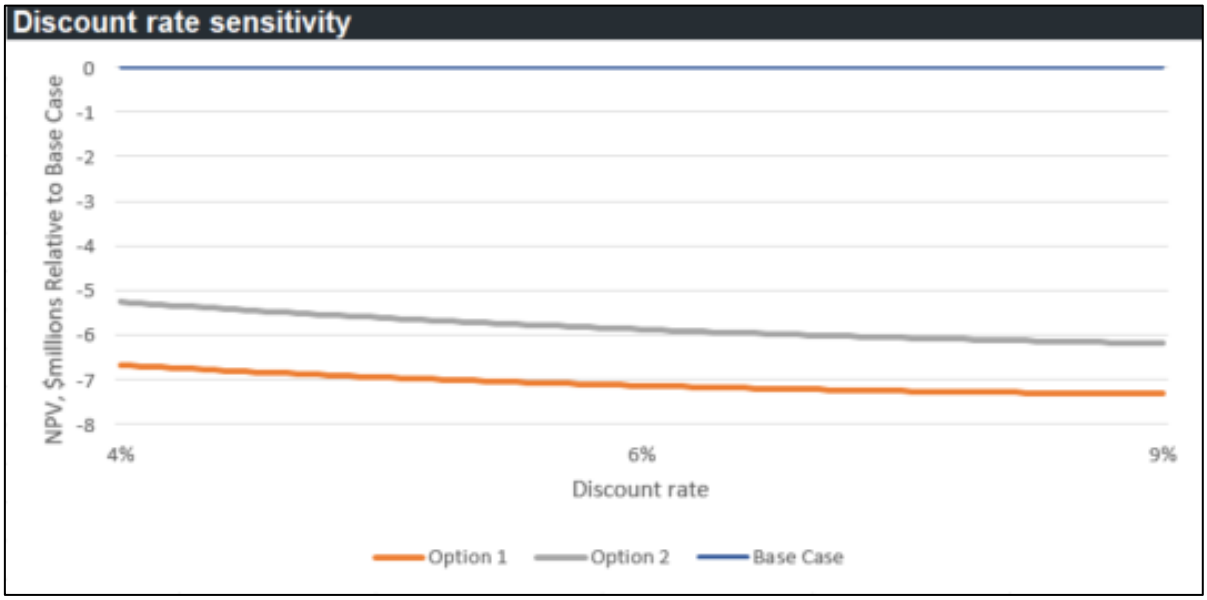


Figure 9.3: Capital Cost Sensitivity

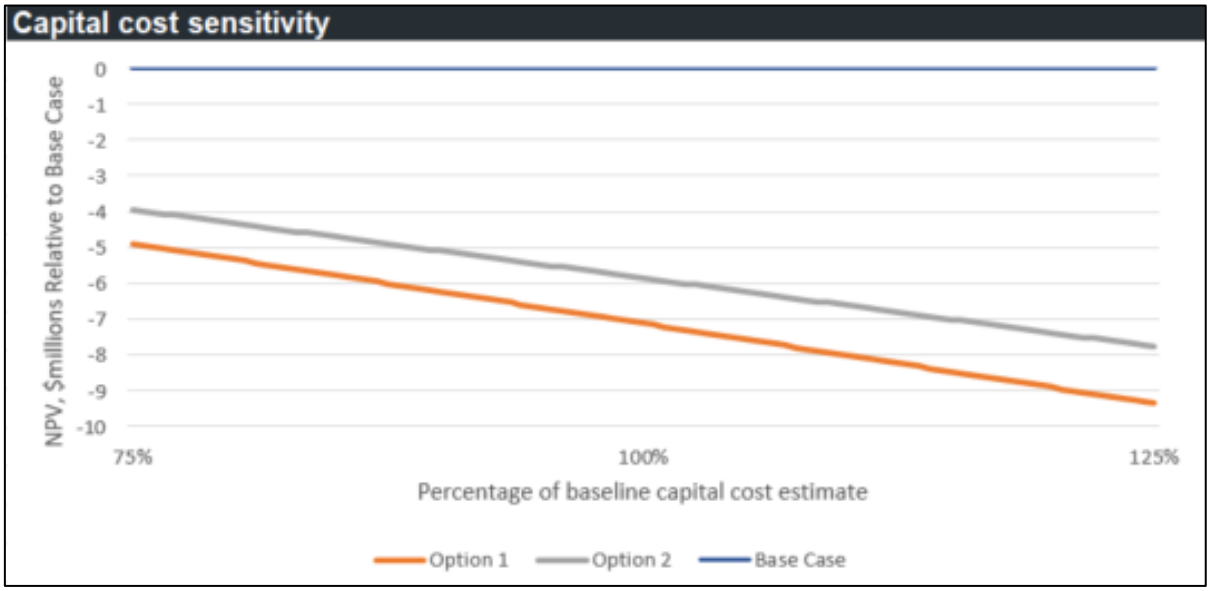


Figure 9.4: Risk Cost Sensitivity

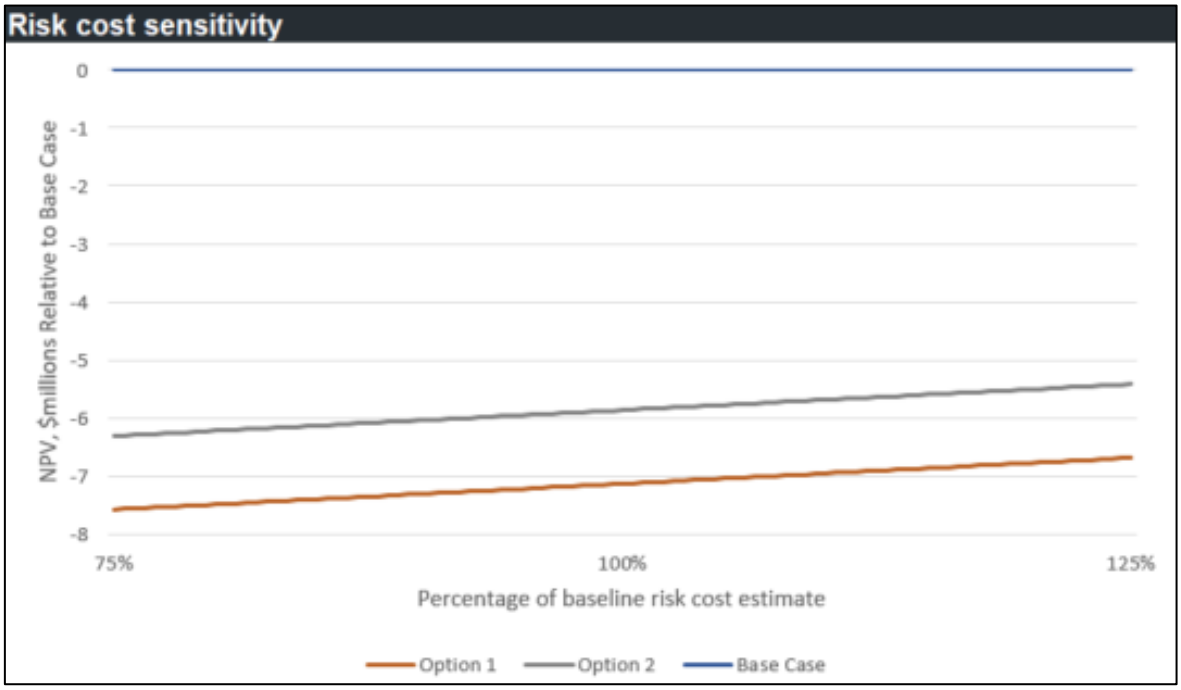
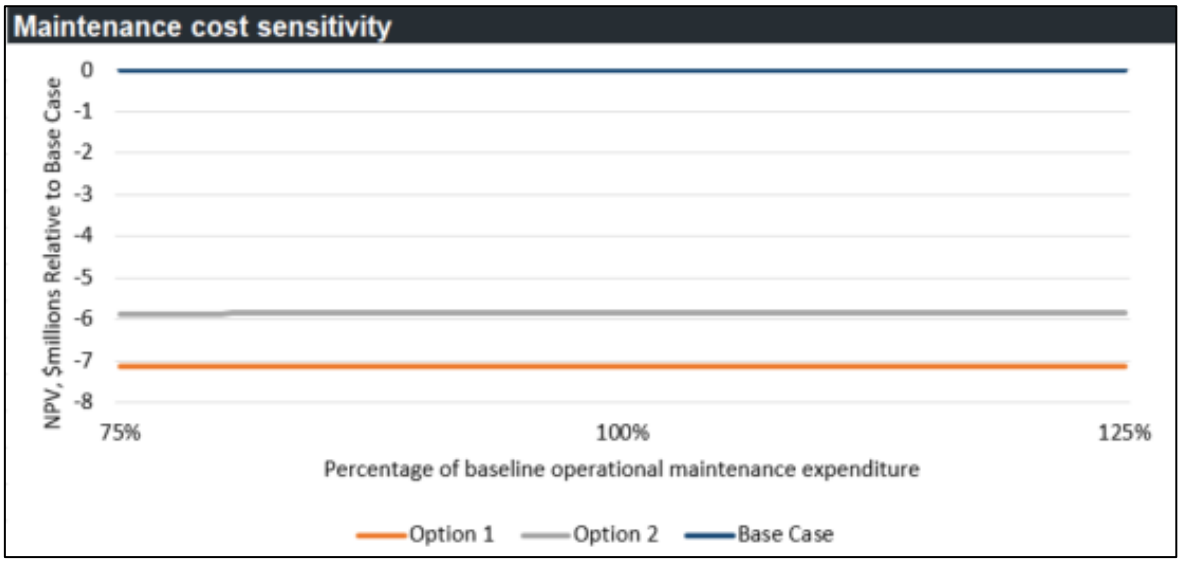


Figure 9.5: Maintenance Cost Sensitivity

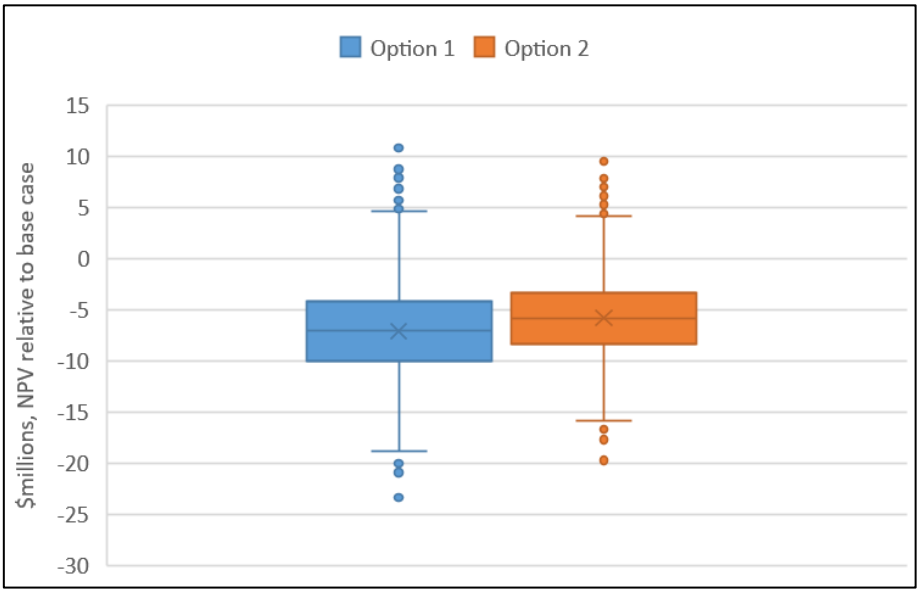


9.3 Sensitivity to multiple parameters

A Monte Carlo simulation was performed with multiple input parameters (including capital cost, discount rate, operational maintenance cost and risk cost) generated for the calculation of the NPV for the credible network option. This process is repeated over 5000 iterations, each time using a different set of random variables from the probability function. The sensitivity analysis output is presented as a distribution of possible NPVs for the credible option, as illustrated in Figure 9.6.

The Monte Carlo simulation shows Option 2 has the higher mean and median values of the two options, confirming it is the preferred option over a range of input parameters in combination.

Figure 9.6: NPV sensitivity analysis of multiple key assumptions relative to the Base Case



9.4 Conclusion

The Base Case is not a credible option, in that it does not allow Powerlink to continue to maintain compliance with relevant standards, applicable regulatory instruments and the Rules. As the investment is classified as a 'reliability corrective action' under the Rules, the purpose of the RIT-T is to identify the credible option that minimises the total cost to customers.

Replacing the existing secondary systems is the only technically and economically feasible network option. The replacement of secondary system in a new building presents the lowest cost option to customers and is considered to satisfy the RIT-T.

10 Draft recommendation

Based on the conclusions drawn from the economic analysis and the Rules requirements relating to the proposed replacement of transmission network assets, it is recommended that Option 2 be implemented to address the risks associated with the deteriorated condition of the aged and obsolete secondary systems infrastructure at Innisfail Substation. Implementing this option will also ensure ongoing compliance with relevant standards, applicable regulatory instruments and the Rules.

Option 2 involves the replacement of secondary systems at Innisfail in a new building at an indicative capital cost of $11.63 million in 2020/21 prices.

Design work will commence in 2022, with installation and commissioning of the new secondary systems completed by December 2024.

11 Submissions requirements

Powerlink invites submissions and comments in response to this PSCR from Registered Participants, AEMO, potential non-network providers and any other interested parties.

Submissions should be presented in a written form and should clearly identify the author of the submission, including contact details for subsequent follow-up if required. If parties prefer, they may request to meet with Powerlink ahead of providing a written response.

11.1 Submissions from non-network providers

This is not a tender process – submissions are requested so that Powerlink can fulfil its regulatory obligations to analyse non-network options. In the event that a non-network option appears to be a genuine and practicable alternative that could satisfy the RIT-T, Powerlink will engage with that proponent or proponents to clarify cost inputs and commercial terms.

Submissions from potential non-network providers should contain the following information:

- details of the party making the submission (or proposing the service)
- technical details of the project (capacity, proposed connection point if relevant, etc.) to allow an assessment of the likely impacts on future supply capability
- sufficient information to allow the costs and benefits of the proposed service to be incorporated in a comparison in accordance with AER RIT-T guidelines
- an assessment of the ability of the proposed service to meet the technical requirements of the Rules
- timing of the availability of the proposed service
- other material that would be relevant in the assessment of the proposed service.

As the submissions will be made public, any commercially sensitive material, or material that the party making the submission does not want to be made public, should be clearly identified. It should be noted that Powerlink is required to publish the outcomes of the RIT-T analysis. If parties making submissions elect not to provide specific project cost data for commercial-in-confidence reasons, Powerlink may rely on cost estimates from independent specialist sources.

11.2 Assessment and decision process

Powerlink intends to carry out the following process to assess what action, if any, should be taken to address future supply requirements:

Part 1	PSCR Publication	30 November 2020
Part 2	Submissions due on the PSCR Have your say on the credible options and propose potential non-network options.	5 March 2021
Part 3	Publication of the PACR Powerlink's response to any further submissions received and final recommendation on the preferred option for implementation.	May 2021

Powerlink reserves the right to amend the timetable at any time. Amendments to the timetable will be made available on the Powerlink website (www.powerlink.com.au).

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