26 March 2025

Monika Moutos
General Manager, Regulation and Policy
Transgrid

Lodged via email: regulatory.consultation@transgrid.com.au

Dear Ms Moutos,

WAGGA NORTH CAPACITY INCREASE PROJECT SPECIFICATION CONSULTATION REPORT (PSCR)

Origin Energy Limited (Origin) welcomes the opportunity to provide feedback on the Wagga North Capacity Increase PSCR. As highlighted by Transgrid, significant growth in renewable generation in the Wagga North region has led to additional constraints and increasing network congestion. With the substantial pipeline of generation projects in the area, we agree this Regulatory Investment Test for Transmission (RIT-T) is timely.

Holistic approach to addressing constraints

We understand that several incremental, short-term options are already available to help relieve the identified constraints. This includes upgraded protection schemes (as proposed within the Network Capability Incentive Parameter Action Plan (NCIPAP)) and tripping schemes for existing generation. This RIT-T, on the other hand, is assessing more significant, longer-term solutions, such as a new double-circuit transmission line under Option 3.

Given the existing significant numbers of constraints and the substantial pipeline of generation projects around Wagga North, we suggest a holistic approach to addressing congestion in the region may be warranted. Specifically, Transgrid should consider both shorter-term solutions for immediate implementation (if approved), while also assessing the net benefits of more significant, longer-term solutions through this RIT-T.

Material market benefits

As a 'market benefits' driven RIT-T, Transgrid has identified lower fuel and capital costs, as well as reduced greenhouse gas emissions, as key benefits of enabling low-cost renewable generation to displace higher-cost conventional generation. Transgrid should also consider including avoided voluntary load curtailment and involuntary load shedding as a class of market benefit.

During periods of network congestion, particularly during evening demand peaks (high-value periods), constraints may unnecessarily limit available generation, increasing the risk of load curtailment or shedding. Additional wider network capacity to mitigate these constraints, if they are material under the modelling scenarios, could provide significant market benefits and, if so, should be included in the RIT-T assessment.

If you wish to discuss any aspect of this submission further, please contact Megan Findlay at [redacted]

Yours sincerely,

[redacted]

Sarah-Jane Derby
Group Manager, Regulatory Policy

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