

Australian Energy Market Operator

Submission made via email to forecasting.planning@aemo.com.au

13 August 2024

Subject: 2025 IASR Scenarios Consultation

SA Power Networks welcomes the opportunity to provide input on AEMO's scenarios to be considered in the development of the 2025 IASR. The IASR and associated scenarios form a key input to our network investment modelling, including the development of our 5-yearly regulatory proposal and strategic planning initiatives.

SA Power Networks has contributed to the development of the recently published *The time is now: Getting smarter with the grid* report by Energy Networks Australia (ENA) and LEK Consulting¹. This report outlines the results of extensive modelling of a more optimal pathway to delivering the energy transition, namely by leveraging the full potential of distribution networks.

We propose that AEMO explore the inclusion of an additional scenario within the 2025 IASR, based on the 'All Levers Pulled' scenario outlined in this report. Key assumptions underpinning this scenario would include²:

- 7GW of additional front-of-meter generation connected to the distribution network by 2030, facilitated by the establishment of distribution renewable energy zones;
- 5GW of additional rooftop PV uptake by 2030, driven by commercial and industrial customers as well as renters and low-income households;
- 5GW of additional front-of-meter, distribution connected battery storage by 2030;
- 1 million additional EVs by 2030, with accelerated uptake driven by increased consumer confidence in public charging availability via DNSP-operated kerbside charging;
- High coordination of CER, driven by national alignment on interoperability standards for behind-the-meter CER communication and innovative network and retail pricing models.

We consider that this additional scenario will expand the breadth of scenario consideration within the IASR, providing an 'upper bound' scenario for several forecast parameters. The inclusion of this scenario would support the goal expressed in SAPN's submission to the *Improving consideration of demand-side factors in the ISP* rule change of progressing towards a truly lowest whole-of-system cost approach to achieving the energy transition.

We look forward to continuing to engage constructively with AEMO on the progressive development of the 2025 IASR and resultant publications. Should you have questions on any aspect of our submission, please contact Liam Mallamo, Future Networks Engineer, at liam.mallamo@sapowernetworks.com.au.



James Brown
Head of Network Strategy

¹ Energy Networks Australia and LEK Consulting (2024) *The time is now: Getting smarter with the grid*. Available at: <https://www.energynetworks.com.au/assets/uploads/The-Time-is-Now-Report-ENA-LEK-August-2024.pdf>.

² All stated increases are relative to the forecasts included in the Step Change scenario of the 2024 ISP.