



**TransGrid**

# **Summary: Managing safety and environmental risks on Line 17 (Avon – Macarthur)**

---

**RIT-T Project Specification Consultation Report**

Region: Southern

Date of issue: 17 July 2020

# Disclaimer

This suite of documents comprises TransGrid's application of the Regulatory Investment Test for Transmission (RIT-T) which has been prepared and made available solely for information purposes. It is made available on the understanding that TransGrid and/or its employees, agents and consultants are not engaged in rendering professional advice. Nothing in these documents is a recommendation in respect of any possible investment.

The information in these documents reflect the forecasts, proposals and opinions adopted by TransGrid at the time of publication, other than where otherwise specifically stated. Those forecasts, proposals and opinions may change at any time without warning. Anyone considering information provided in these documents, at any date, should independently seek the latest forecasts, proposals and opinions.

These documents include information obtained from the Australian Energy Market Operator (AEMO) and other sources. That information has been adopted in good faith without further enquiry or verification. The information in these documents should be read in the context of the Electricity Statement of Opportunities, the Integrated System Plan published by AEMO and other relevant regulatory consultation documents. It does not purport to contain all of the information that AEMO, a prospective investor, Registered Participant or potential participant in the National Electricity Market (NEM), or any other person may require for making decisions. In preparing these documents it is not possible, nor is it intended, for TransGrid to have regard to the investment objectives, financial situation and particular needs of each person or organisation which reads or uses this document. In all cases, anyone proposing to rely on or use the information in this document should:

1. Independently verify and check the currency, accuracy, completeness, reliability and suitability of that information
2. Independently verify and check the currency, accuracy, completeness, reliability and suitability of reports relied on by TransGrid in preparing these documents
3. Obtain independent and specific advice from appropriate experts or other sources.

Accordingly, TransGrid makes no representations or warranty as to the currency, accuracy, reliability, completeness or suitability for particular purposes of the information in this suite of documents.

Persons reading or utilising this suite of RIT-T-related documents acknowledge and accept that TransGrid and/or its employees, agents and consultants have no liability for any direct, indirect, special, incidental or consequential damage (including liability to any person by reason of negligence or negligent misstatement) for any damage resulting from, arising out of or in connection with, reliance upon statements, opinions, information or matter (expressed or implied) arising out of, contained in or derived from, or for any omissions from the information in this document, except insofar as liability under any New South Wales and Commonwealth statute cannot be excluded.

## Privacy notice

TransGrid is bound by the *Privacy Act 1988 (Cth)*. In making submissions in response to this consultation process, TransGrid will collect and hold your personal information such as your name, email address, employer and phone number for the purpose of receiving and following up on your submissions.

Under the National Electricity Law, there are circumstances where TransGrid may be compelled to provide information to the Australian Energy Regulator (AER). TransGrid will advise you should this occur.

TransGrid's Privacy Policy sets out the approach to managing your personal information. In particular, it explains how you may seek to access or correct the personal information held about you, how to make a complaint about a breach of our obligations under the Privacy Act, and how TransGrid will deal with complaints. You can access the Privacy Policy here (<https://www.transgrid.com.au/Pages/Privacy.aspx>).

# Summary

TransGrid is applying the Regulatory Investment Test for Transmission (RIT-T) to options for mitigating safety and environmental risks caused by the deteriorating condition of Line 17. Publication of this Project Specification Consultation Report (PSCR) represents the first step in the RIT-T process.

Constructed in 1964, the 41 km single circuit 330 kV transmission line is comprised of 101 steel tower structures between Avon switching station and Macarthur 330 kV substation. Line 17 forms a key link between the Wollongong region and the Sydney metropolitan area.

The line will continue to play a central role in supporting the flow of energy between regions to take advantage of naturally-diverse weather patterns, and in the safe and reliable operation of the power system throughout and after the transition to a low-carbon electricity future.

The southern section of Line 17 passes through forested areas with a significant portion located on land belonging to the Sydney Catchment Authority. The northern section of the line between Appin and Macarthur is located near residential areas including rapidly expanding suburban developments in the Campbelltown region.

Condition issues that will impact the safe and reliable operation of the network have been found on the line. These raise a number of risks associated with asset failure, including safety and environmental (bushfire) risks.

**Table 1 Condition issues along Line 17 and their consequences**

Issue	Impact
Corrosion of tower steel members	Steel corrosion, particularly of critical members, can lead to structural failure of tower
Corroded fasteners	Structural failure
Corroded insulators and conductor attachment fittings	Conductor drop
Corrosion of earth wire and earthwire attachment fittings	Conductor drop Public safety risk increase in case of fault
Conductor dampers	Accelerated conductor fatigue due to vibration
Buried legs and ground level steel corrosion	Foundation failure

As the asset condition deteriorates over time, the likelihood of failure and subsequent risks will increase should these issues not be addressed.

## Identified need: managing safety and environmental risks from corrosion on Line 17

The proposed investment will enable TransGrid to manage safety and environmental risks on Line 17. Options considered under this RIT-T have been assessed relative to a base case. Under the base case, no proactive capital investment is made and the condition of Line 17 will continue to deteriorate.

TransGrid calculates that the safety and environmental risk costs associated with the condition deterioration and corrosion of Line 17 are approximately \$59.4m per year. Further condition deterioration of the affected assets due to corrosion would mean an increase in bushfire and safety risks along Line 17 as the likelihood of failure increases. If left untreated, corrosion of some of the vital components of the steel towers could result in

incidents such as conductor drop and tower collapse. Such incidents could have serious safety consequences for nearby residents and members of the public, as well as TransGrid field crew members who may be working on or near the assets. The southern section of the line traverses forested areas, increasing the risk of bushfire from a conductor drop. The consequence of the bushfire is further magnified by its proximity to the urban areas in the Macarthur region.

TransGrid manages and mitigates bushfire and safety risk to ensure they are below risk tolerance levels or 'As Low As Reasonably Practicable' ('ALARP'), in accordance with TransGrid's obligations under the New South Wales Electricity Supply (Safety and Network Management) Regulation 2014 and TransGrid's Electricity Network Safety Management System (ENSMS).<sup>1</sup>

The proposed investment will enable TransGrid to continue to manage and operate this part of the network to a safety and risk mitigation level of ALARP. Consequently, it is considered a reliability corrective action under the RIT-T. A reliability corrective action differs from a 'market benefits'-driven RIT-T in that the preferred option is permitted to have negative net economic benefits on account of it being required to meet an externally imposed obligation on the network business.

## Credible options considered

In this PSCR, TransGrid has put forward for consideration credible options that would meet the identified need from a technical, commercial, and project delivery perspective.<sup>2</sup>

These are summarised in the following table.

**Table 2 Summary of credible options**

Option	Description	Capital costs (\$m 2020/21)	Operating costs (\$ per year)	Remarks
Option 1	Line refurbishment	6.6 (+/- 25%)	41,000	<b>Most economical and preferred option</b>
Option 2	Line dismantling	~12.8	Not costed	Line dismantling is not technically feasible as Macarthur BSP will be radially supplied (N redundancy), which is not acceptable as the IPART reliability standard requires N-1 redundancy for Macarthur BSP.
Option 3	New transmission line from Avon switching station to Macarthur substation	> 100	Not considered	Due to significant costs of this option, a new 330 kV transmission line from Avon switching station to Macarthur substation is not commercially feasible.

<sup>1</sup> TransGrid's ENSMS follows the International Organization for Standardization's ISO31000 risk management framework which requires following hierarchy of hazard mitigation approach.

<sup>2</sup> As per clause 5.15.2(a) of the NER.

## Non-network options are not able to assist in this RIT-T

TransGrid does not consider non-network options to be commercially and technically feasible to assist with meeting the identified need for this RIT-T, as non-network options will not mitigate the safety and environment risk posed as a result of corrosion-related asset deterioration.

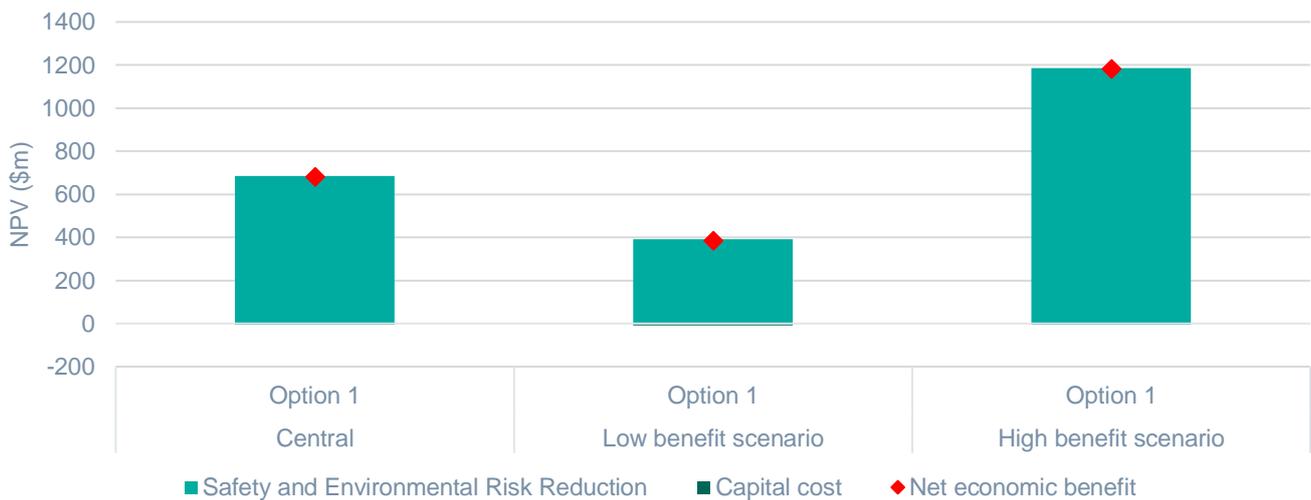
## Implementing Option 1 will meet relevant regulatory obligations

Applying the ALARP principle to manage and mitigate bushfire and safety risks, TransGrid determines that its obligations under the New South Wales Electricity Supply (Safety and Network Management) Regulation 2014 and TransGrid's ENSMS will be met by implementing Option 1 by 2022/23. Under this principle, risks are mitigated unless it is possible to demonstrate that the costs involved in further reducing the risk would be grossly disproportionate to the benefits gained.

## Option 1 delivers highest net economic benefits

All scenarios and sensitivities under Option 1 are positive. Figure E-1 shows that the costs of mitigating the bushfire and safety risks for Option 1 are less than the benefit of avoiding those risks.

Figure 1 Net economic benefits, present value (\$m 2020/21)



Under the ALARP test a gross disproportionate factor<sup>3</sup> would typically be applied. Applying the factor in this case would only further enhance support for Option 1 as the outcome of the NPV analysis already demonstrates that the benefits are positive. TransGrid's analysis concluded that the costs are less than the weighted benefits from mitigating bushfire and safety risks. Accordingly, TransGrid has not repeated the assessment with the disproportionality factor multipliers.

## Draft conclusion

The optimal commercially and technically feasible option presented in this PSCR – Option 1 (line refurbishment) – is the preferred option to meet the identified need.

<sup>3</sup> In accordance with the framework for applying the ALARP principle, a disproportionality factor of 6 is typically applied to risk cost figures. The values of the disproportionality factors applied by TransGrid were determined through a review of practises and legal interpretations across multiple industries, with particular reference to the works of the UK Health and Safety Executive. The methodology used to determine the disproportionality factors is in line with the principles and examples presented in the AER Replacement Planning Guidelines and is consistent with TransGrid's Revised Revenue Proposal 2018/19- 2022/23.

Moving forward with this option is the most prudent and economically efficient solution to manage and mitigate safety and environmental risk to ALARP. Consequently, it will ensure TransGrid's obligations under the New South Wales Electricity Supply (Safety and Network Management) Regulation 2014 and TransGrid's Electricity Network Safety Management System (ENSMS) are met.

The estimated capital expenditure associated with this option is \$6.6 million +/- 25 per cent. Routine operating and maintenance costs relating to planned checks by TransGrid field crew are approximately \$41,000 per year – similar to the cost under the base case. TransGrid calculates that the avoided risk cost by undertaking Option 1 is approximately \$59.3 million per year.

This preferred option, Option 1, is found to have positive net benefits under all scenarios investigated and on a weighted basis will deliver \$731.0 million in net economic benefits. TransGrid also conducted sensitivity analysis on the net economic benefit to investigate the robustness of the conclusion to key assumptions. TransGrid finds that under all sensitivities, positive net benefits are expected from refurbishing Line 17.

The works will be undertaken between 2019/20 and 2021/22. Planning and procurement (including completion of the RIT-T) commenced in 2019/20 and is due to conclude in 2020/21, while project delivery and construction will occur in 2021/22.

All works will be completed in accordance with the relevant standards by 2021/22 with minimal modification to the wider transmission assets. Necessary outages of affected line(s) in service will be planned appropriately in order to complete the works with minimal impact on the network.

## Exemption from preparing a Project Assessment Draft Report

---

Subject to additional credible options being identified during the consultation period, publication of a Project Assessment Draft Report (PADR) is not required for this RIT-T as TransGrid considers its investment in relation to the preferred option to be exempt from that part of the process under NER clause 5.16.4(z1). Production of a PADR is not required due to:

- > the estimated capital cost of the proposed preferred option being less than \$43 million<sup>4</sup>;
- > the PSCR states:
  - the proposed preferred option (including reasons for the proposed preferred option)
  - RIT-T is exempt from producing a PADR
  - the proposed preferred option and any other credible option will not have material market benefits<sup>5</sup> except for voluntary load curtailment and involuntary load shedding
- > RIT-T proponent considers that there were no PSCR submissions identifying additional credible options that could deliver a material market benefit; and
- > the PACR must address any issues raised in relation to the proposed preferred option during the PSCR consultation.

---

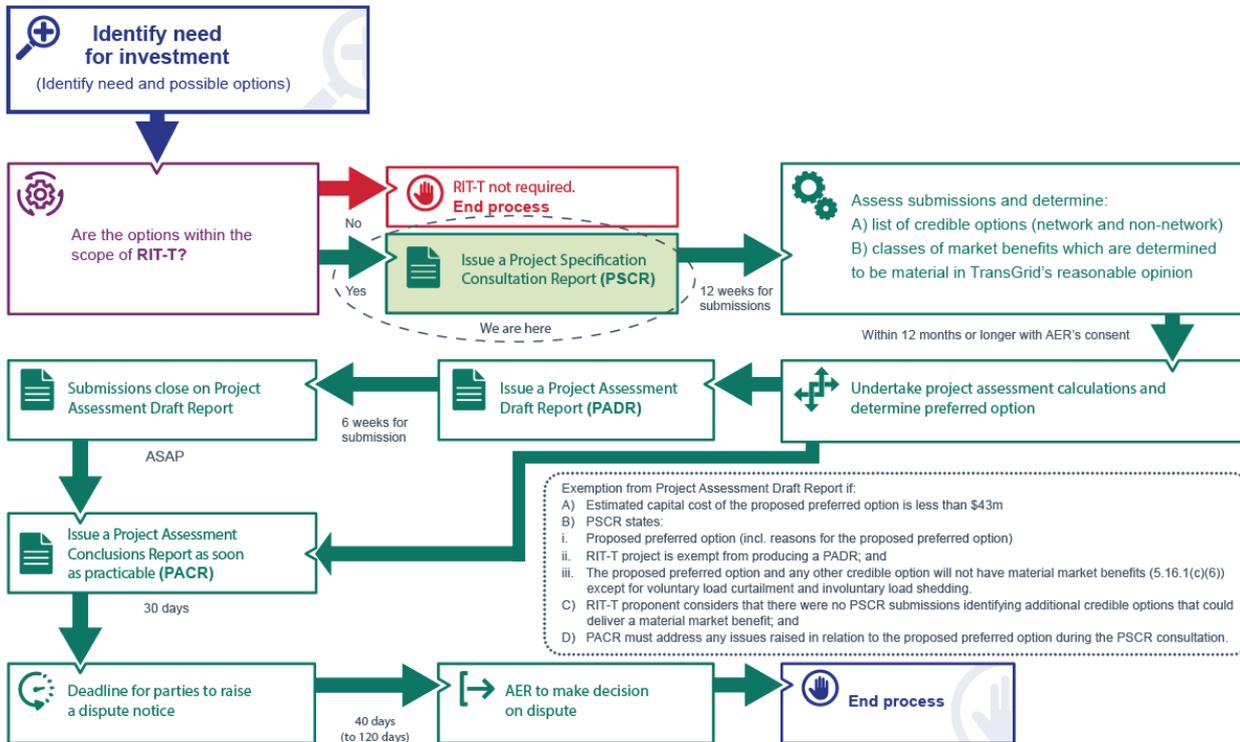
<sup>4</sup> Varied from \$35m to \$43m based on the AER Final Determination: Cost threshold review November 2018.14. Accessed 20 May 2020  
<https://www.aer.gov.au/networks-pipelines/guidelines-schemes-models-reviews/cost-thresholds-review-for-the-regulatory-investment-tests-2018>

<sup>5</sup> As per clause 5.16.1(c)(6)

## Submissions and next steps

The purpose of this PSCR is to set out the reasons TransGrid proposes that action be taken, present the options that address the identified need, outline the technical characteristics that non-network options will need to provide, and allow interested parties to make submissions and provide input to the RIT-T assessment.

Figure 2 This PSCR is the first stage of the RIT-T process



TransGrid welcomes written submissions on materials contained in this PSCR. Submissions are particularly sought on the credible options presented and from potential proponents of non-network options that could meet the technical requirements set out in this PSCR. Submissions are due on 12 October 2020<sup>6</sup>.

Submissions should be emailed to TransGrid's Regulation team via [RIT-TConsultations@transgrid.com.au](mailto:RIT-TConsultations@transgrid.com.au).<sup>7</sup> In the subject field, please reference 'Line 17 PSCR.'

At the conclusion of the consultation process, all submissions received will be published on TransGrid's website. If you do not wish for your submission to be made public, please clearly specify this at the time of lodgement.

Should TransGrid consider that no additional credible options were identified during the consultation period, TransGrid intends to produce a Project Assessment Conclusions Report (PACR) that addresses all submissions received including any issues in relation to the proposed preferred option raised during the consultation period.<sup>8</sup> Subject to additional credible options being identified, TransGrid anticipates publication of a PACR by November 2020.

To read the full Project Specification Consultation Report visit the [Regulatory Investments Test page](#) on TransGrid's website.

<sup>6</sup> Consultation period is for 12 weeks, additional days have been added to cover public holidays

<sup>7</sup> TransGrid is bound by the Privacy Act 1988 (Cth). In making submissions in response to this consultation process, TransGrid will collect and hold your personal information such as your name, email address, employer and phone number for the purpose of receiving and following up on your submissions. If you do not wish for your submission to be made public, please clearly specify this at the time of lodgement. See Privacy Notice within the Disclaimer for more details.