AusNet

ILJIN Overhead Manual Switch Replacement Program

Regulatory Investment Test for Distribution

Final Project Assessment Report

Friday, 16 February 2024

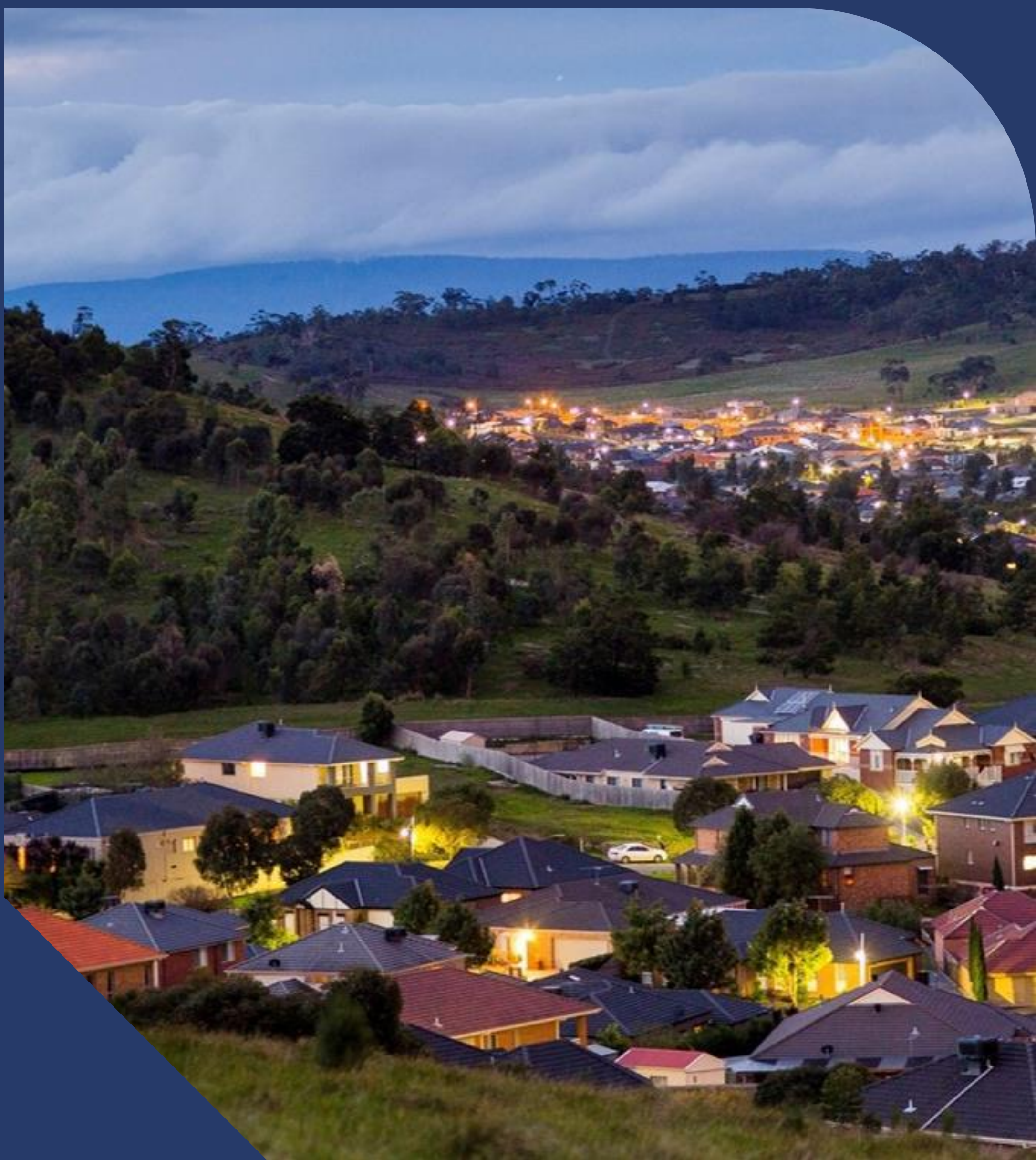

Table of contents

1. Executive summary 2
 1.1. Identified Need 2
 1.2. Options considered and preferred option 2
 1.3. Contact details 2
2. Project background 3
 2.1. Asset condition 3
 2.2. Identified need 3
 2.3. Assumptions and methodology 3
3. Regulatory obligations 5
4. Potential Credible Options 6
 4.1. Option 0: Do Nothing or BAU 6
 4.2. Option 1: Replace switches with NGK and Schnieder Electric switches 6
 4.3. Option 2: Replace switches with NGK 6
5. Economic assessment of the credible options 7
 5.1. Market benefit 7
 5.2. Methodology 8
 5.3. Key variables and assumptions 10
 5.4. Cost benefit analysis 10
 5.5. Preferred option 11
 5.6. Capital and operating costs of the preferred option 12
6. Satisfaction of the RIT-D 13

1. Executive summary

AusNet is a regulated Victorian Distribution Network Service Provider (DNSP) that supplies electrical distribution services to more than 795,000 customers. Our electricity distribution network covers eastern rural Victoria and the fringe of the northern and eastern Melbourne metropolitan area.

As expected by our customers and required by the various regulatory instruments that we operate under, AusNet aims to maintain service levels at the lowest possible cost to our customers. To achieve this outcome, we develop forward looking plans that aim to maximise the present value of economic benefit to all those who produce, consume and transport electricity in the National Electricity Market (NEM).

Our approach is to consider network and non-network options on their merits, so that we meet our customers' needs and our compliance obligations at the lowest total cost. Where applicable, we also prepare, publish, and consult on a regulatory investment test for distribution (RIT-D), which further helps ensure all credible options are identified and considered, and the best option is selected.

This Final Project Assessment Report (FPAR) is the final stage of the RIT-D consultation process in relation to the ILJIN overhead switch replacement project. The FPAR follows our earlier publication of

- a notice of determination in accordance with clause 5.17.4(d) of the National Electricity Rules (NER), which explained that there are no credible non-network options that could address the identified need.
- the Draft Project Assessment Report (DPAR) in relation to this project, which presented cost benefit analysis and invited submissions from stakeholders.

We did not receive any submissions in response to the DPAR.

This FPAR has been prepared by AusNet in accordance with the requirements of clause 5.17 of the NER. This FPAR complies with the requirements of Clause 5.17.4(j) of the NER, as detailed in section 6 of this document, and the AER's RIT-D application guidelines. The analysis and conclusions presented in this FPAR are unchanged from those presented in the DPAR.

1.1. Identified Need

The performance of 480 existing ILJIN overhead switches is adversely affected by their condition, which is rendering them inoperable and unsafe. As a result, AusNet's network reliability is adversely affected, leading to increased outages for some customers. The identified need is to address the safety and network performance issues arising from these switches in accordance with our regulatory obligations and good industry practice.

1.2. Options considered and preferred option

The options considered in this DPAR are:

- 'Do nothing' or Business as Usual;
- Option 1: Replace ILJIN switches with condition score 3 and above with NGK and Schnieder Electric switches; and
- Option 2: Replace ILJIN switches with condition score 3 and above with NGK switches.

Our cost-benefit analysis has identified Option 1 as the preferred option.

1.3. Contact details

Feedback on this document may be provided to ritdconsultations@ausnetservices.com.au and telephone enquiries can be directed to Brent Noble on (03) 9695 6000.

2. Project background

2.1. Asset condition

AusNet's 22kV network comprises approximately 1400 pole mounted, ILJIN manufactured, 24kV manual SF6 gas load break switches. These manual switches enhance network reliability through minimising customer disruptions during planned or unplanned maintenance and network outages resulting from faults.

Following an incident in October 2022, AusNet launched an internal investigation on ILJIN switch condition and placed a suspension on the reuse of the switches as well as manual operation of switches with significant signs of corrosion. The figure below shows the physical impact of corrosion on these switches.

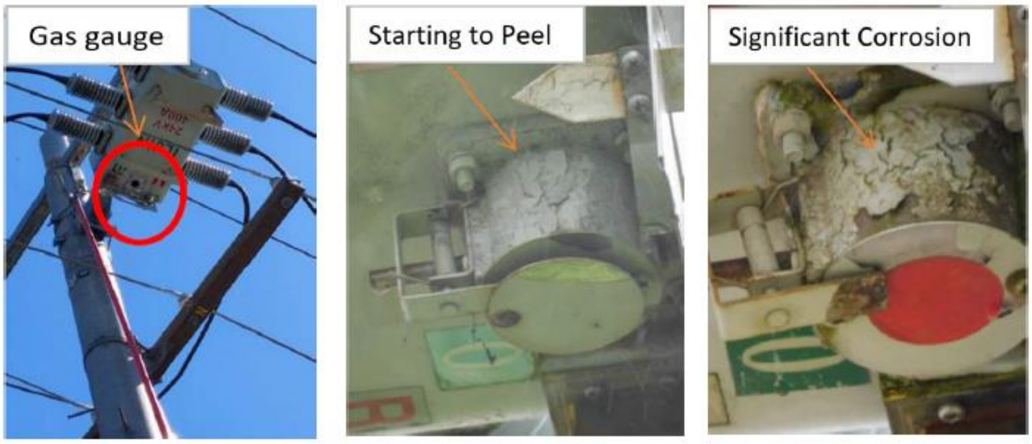

Figure 1: Impact of corrosion on the condition of ILJIN overhead switches

To provide a consistent assessment of the condition of the whole asset group, a common condition scoring methodology has been developed. This methodology uses the known condition details of each asset and grades that asset against common asset condition criteria. There are five different condition scores ranging from "Very Good" (C1) to "Very Poor" (C5).

A comprehensive analysis involving desktop assessments and field visits revealed that a majority of ILJIN overhead switches with a condition score of C3 or higher exhibited significant corrosion around the safety gauge, rendering them unsafe and inoperable. In total, AusNet found that 480 switches (about 34%) were in an inoperable condition.

With the switches in an inoperable condition, planned and unplanned outages may affect more customers than would otherwise be the case. The impact on reliability performance affects our customers and has a financial impact on AusNet through the Service Target Performance Incentive Scheme (STPIS).

2.2. Identified need

The performance of 480 existing ILJIN overhead switches is adversely affected by their condition, which is rendering them inoperable and unsafe. As a result, AusNet's network reliability is adversely affected, leading to increased outages for some customers. The identified need is to address the safety and network performance issues arising from these switches in accordance with our regulatory obligations and good industry practice.

2.3. Assumptions and methodology

The principal assumption underpinning our identified need is that the condition assessments have been conducted appropriately so that the ILJIN overhead switches that are inoperable have been correctly identified. In conducting the cost benefit analysis, our methodology will consider:

- Probability of failure.
- Consequence of failure:

- value of unserved energy – which is the product of VCR (value of customer reliability), EAR (energy at risk) and the MTTR (mean time to repair); and
- safety risk cost. For the purpose of this RIT-D, we have not estimated the safety risk cost in our cost benefit analysis, although we have recognised that safety is a driver of the asset replacement decision.

- Cost of replacement:
  - cost of replacement in today's $ value;
  - cost of replacement NPV for each option considered; and
  - cumulated consequence and cost of replacement NPV for each option.
- Benefit of replacement:
  - calculated benefit NPV as a difference between the consequence NPV and cost of replacement NPV; and
  - calculated preferred option as a maximum NPV benefit across all considered options.

3. Regulatory obligations

In addressing the identified need, we must satisfy our regulatory obligations, which we summarise below.

Clause 6.5.7 of the NER requires AusNet to only propose capital expenditure required to achieve each of the following:

(1) meet or manage the expected demand for standard control services over that period;

(2) comply with all applicable regulatory obligations or requirements associated with the provision of standard control services;

(3) to the extent that there is no applicable regulatory obligation or requirement in relation to:

(i) quality, reliability or security of supply of standard control services; or

(ii) the reliability or security of the distribution system through the supply of standard control services

to the relevant extent:

(iii) maintain the quality, reliability and security of supply of standard control services, and

(iv) maintain the reliability and security of the distribution system through the supply of standard control services; and

(4) maintain the safety of the distribution system through the supply of standard control services.

Section 98(a) of the Electricity Safety Act requires AusNet to design, construct, operate, maintain and decommission its supply network to minimise as far as practicable:

(a) the hazards and risks to the safety of any person arising from the supply network; and

(b) the hazards and risks of damage to the property of any person arising from the supply network; and

(c) the bushfire danger arising from the supply network.

The Electricity Safety act defines 'practicable' to mean having regard to –

(a) severity of the hazard or risk in question; and

(b) state of knowledge about the hazard or risk and any ways of removing or mitigating the hazard or risk; and

(c) availability and suitability of ways to remove or mitigate the hazard or risk; and

(d) cost of removing or mitigating the hazard or risk.

Clause 19.2.1(b) of the Electricity Distribution Code of Practice requires AusNet to:

develop and implement plans for the acquisition, creation, maintenance, operation, refurbishment, repair and disposal of its distribution system assets and plans for the establishment and augmentation of transmission connections:

(i) to comply with the laws and other performance obligations which apply to the provision of distribution services including those contained in this Code of Practice;

(ii) to minimise the risks associated with the failure or reduced performance of assets; and

(iii) in a way which minimises costs to customers taking into account distribution losses.

Under clause 13.3.1 of the Electricity Distribution Code of Practice, AusNet:

must use best endeavours to meet targets required by the Price Determination and targets published under clause 13.2.1 [relating to reliability of supply] and otherwise meet reasonable customer expectations of reliability of supply.

As already noted, AusNet regards safety as a driver of the replacement decision.

4. Potential Credible Options

This section explains the potential credible options that have been considered to address the identified need, and summarises the key works and costs associated with implementing these options, which are:

- 'Do nothing' or Business as Usual;
- Option 1: Replace ILJIN switches with condition score 3 and above with NGK and Schnieder Electric switches; and
- Option 2: Replace ILJIN switches with condition score 3 and above with NGK switches.

4.1. Option 0: Do Nothing or BAU

The Do Nothing (counterfactual) or BAU option assumes that AusNet would not undertake any investment, outside of the normal operational and maintenance processes. The Do Nothing (counterfactual) option establishes the base level of risk and provides a basis for comparing other credible options.

Whilst the direct capital costs of this option are zero, the continued exposure to residual risks means that this option has significant risk costs associated with it, including safety risks. In relation to the identified need for this project, 'do nothing' is not a credible option because of the safety implications arising from 'do nothing' or BAU.

4.2. Option 1: Replace switches with NGK and Schnieder Electric switches

Option 1 is to replace approximately 480 ILJIN manual switches with condition score 3 with combination of NGK and Schnieder Electric switches. In comparison with BAU and option 2, this option provides the greatest reliability benefits and efficient management of network. As NGK is only able to supply 10 switches per month, AusNet would augment this supply with an additional 30 switches per month from Schnieder Electric. This will result in faster commissioning, so that the project can be completed sooner.

The safety implications arising from condition rating of 3 or higher means that it is prudent to replace 480 ILJIN manual switches. In our view, it would not be appropriate to consider replacing greater or fewer numbers of switches as this would mean replacing switches that are either in good condition or not replacing switches that are likely to have safety-related issues.

4.3. Option 2: Replace switches with NGK

Option 2 is to replace 480 ILJIN manual switches with condition score 3 as per Option 1 with our incumbent supplier NGK switches. However, the current supply issues with our incumbent supplier, would mean that the project completion would be delayed to December 2028. As a result of this longer timeframe, the residual risks under this option would be greater than Option 1, including increased safety risks.

5. Economic assessment of the credible options

5.1. Market benefit

The regulatory investment test for distribution requires the RIT-D proponent to consider whether each credible option provides the classes of market benefits described in clause 5.17.1(c)(4) of the NER. To address this requirement, the table below discusses our approach to each of the market benefits listed in clause 5.17.1(c)(4) in assessing the credible options to address the identified need relating to the proactive replacement of ILJIN overhead manual switches that are at risk of failure because of their condition.

Table 1: Analysis of Market Benefits

Class of Market Benefit	Analysis
(i) changes in voluntary load curtailment;	The options are not expected to lead to changes in voluntary load curtailment.
(ii) changes in involuntary load shedding and customer interruptions caused by network outages, using a reasonable forecast of the value of electricity to customers;	The options are expected to have an impact on involuntary load shedding. AusNet applies probabilistic planning techniques to assess the expected cost of unserved energy for each option.
(iii) changes in costs for parties, other than the RIT-D proponent, due to differences in: *(A) the timing of new plant;* *(B) capital costs; and* *(C) the operating and maintenance costs;*	There is no impact on other parties.
(iv) differences in the timing of expenditure;	This project will not result in changes in the timing of other expenditure.
(v) changes in load transfer capacity and the capacity of Embedded Generators to take up load;	This project will not impact on the capacity of Embedded Generators to take up load.
(vi) any additional option value (where this value has not already been included in the other classes of market benefits) gained or foregone from implementing the credible option with respect to the likely future investment needs of the National Electricity Market;	This project will not impact the option value in respect to likely future investment needs of the NEM.
(vii) changes in electrical energy losses; and	This project will not result in changes to electrical energy losses.
(viii) any other class of market benefit determined to be relevant by the AER.	We do not consider any other class of market benefit as relevant to the selection of the preferred option.

5.2. Methodology

The purpose of this section is to provide a high-level explanation of our methodology for identifying the preferred option. As a general principle, it is important that the methodology takes account of the identified need and the factors that are likely to influence the choice of the preferred option. As such, the methodology is not a 'one size fits all' approach, but one that is tailored for the particular circumstances under consideration.

In principle, the identified need for this project can be described in terms of two types of risk:

- supply risk, where an asset failure may lead to a loss of supply to customers; and
- non-supply risk, which captures the potential consequences of an asset failure, which may include safety, bushfire risk and environmental costs, in addition to damage to adjacent assets or property.

In relation to supply risk, we adopt a probabilistic planning methodology which considers the likelihood and severity of critical network conditions and outages. The expected annual cost to customers associated with supply risk is calculated by multiplying the expected unserved energy (the expected energy not supplied based on the probability of the supply constraint occurring in a year) by the value of customer reliability (VCR).

In relation to non-supply risks, our approach monetises this risk by multiplying the following parameter estimates:

- the probability of asset failure;
- the cost of consequence of the asset failure;
- the likelihood of the consequence given the failure has occurred; and
- the number of assets to which the analysis relates.

The purpose of the cost benefit analysis that underpins the RIT-D assessment is to determine whether there is a cost-effective option to mitigate the supply and non-supply risks (the aggregate 'risk-cost'). To be cost-effective, the reduction in the aggregate risk-cost that an option is expected to provide must exceed the cost of implementing that option. The preferred option provides greatest expected net benefit, expressed in present value terms.

In the absence of remedial action,

Figure 2 shows how the aggregate risk-cost will typically increase as the risk of asset failure and energy at risk increase over time. The optimal timing of the preferred option occurs when the annualised capital cost of that option (or the operating cost for a non-network option) is equal to the aggregate risk-cost.

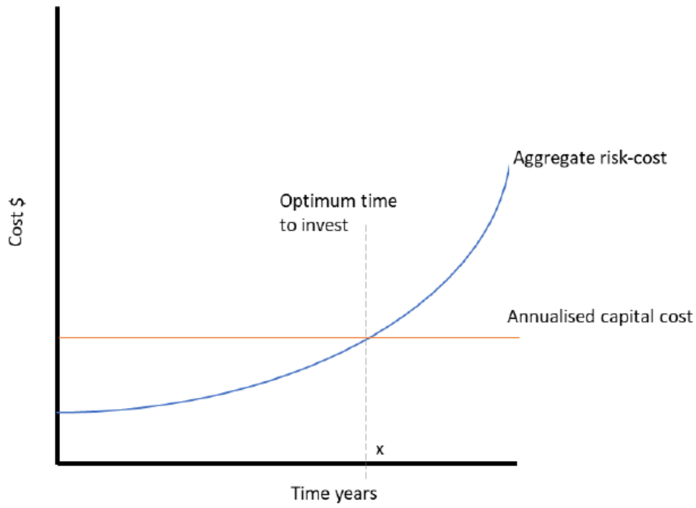

Figure 2: Increasing risk-cost over time and optimal project timing[1]

In effect, the preferred option delivers the lowest total cost to customers, which is the sum of the cost of implementing that option and any residual risk-cost. In this particular case, however, we have decided not to calculate the safety related costs. As shown in the cost-benefit analysis later in this RIT-D, the preferred option delivers a net economic benefit without considering the safety-related costs. This approach is consistent with the RIT-D guidelines, which state that: [2]

1 This figure is reproduced from the AER's Industry practice application note, Asset replacement planning, January 2019, figure 8. This figure assumes that the option eliminates the aggregate risk-cost in full, which may not be the case.

2 AER, Application guidelines, Regulatory investment test for distribution, August 2022, page 12.

Network businesses should use their discretion in determining the rigour they apply to their investment decisions, which should be commensurate with the magnitude and risks associated with the investment at hand.

The identification of the preferred option is complicated by the fact that the future is uncertain and that various input parameters are 'best estimates' rather than known values. Therefore, the RIT-D analysis must be conducted in the face of uncertainty.

To address uncertainty in our assessment of the credible options, we use sensitivity analysis and scenario analysis in our cost benefit assessment. As recommended by the AER's application guidelines, we use sensitivity analysis to assist in determining an appropriate set of reasonable scenarios.[3] The relationship between sensitivity analysis and scenarios is best explained by the AER's practice note:[4]

Scenarios should be constructed to express a reasonable set of internally consistent possible future states of the world. Each scenario enables consideration of the prudent and efficient investment option (or set of options) that deliver the service levels required in that scenario at the most efficient long run service cost consistent with the National Electricity Objective (NEO).

Sensitivity analysis enables understanding of which input values (variables) are the most determinant in selecting the preferred option (or set of options). By understanding the sensitivity of the options model to the input values a greater focus can be placed on refining and evidencing the key input values. Generally the more sensitive the model output is to a key input value, the more value there is in refining and evidencing the associated assumptions and choice of value.

Scenario and sensitivity analyses should be used to demonstrate that the proposed solution is robust for a reasonable range of futures and for a reasonable range of positive and negative variations in key input assumptions. NSPs should explain the rationale for the selection of the key input assumptions and the variations applied to the analysis.

In applying sensitivities and scenarios to our cost benefit assessment, we have regard to the particular circumstances to ensure that the approach is appropriate. Where our analysis shows that an option is clearly preferred, we will not undertake further testing. This approach is consistent with clause 5.17.1(c)(2) of the NER, which states that the RIT–D must not require a level of analysis that is disproportionate to the scale and likely impact of each credible option considered.

In preparing the RIT-D, we have also had regard to AEMO's 2023 Inputs, Assumptions and Scenarios Report and its 2022 Integrated System Plan (ISP). We note that the scenarios adopted by AEMO are focused particularly on the matters that are relevant to major transmission investments, rather than distribution investments of the type considered in this report. Accordingly, we have adopted an approach that is appropriate to the specific circumstances described in this report relating to the identified need and the credible options.

We note that the current IASR scenarios – which relate principally to changes in the wholesale generation market – are not relevant to this investment decision. Specifically, the IASR scenarios – progressive change, step change and green energy exports – are expressed in terms of their respective contributions to Australia's possible decarbonisation future, as depicted in the figure below. While critical to ISP projects, these dimensions have no practical bearing on the asset replacement decision that is being considered in this RIT-D.

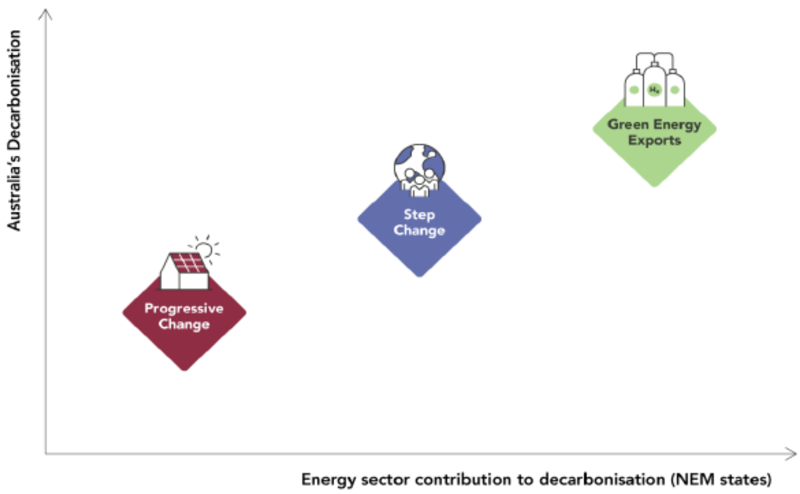

Figure 3: AEMO's scenarios for its 2023 IASR[5]

[3] AER, Application guidelines, Regulatory investment test for distribution, August 2022, page 42.

[4] AER, Asset replacement planning, January 2019, page 36.

[5] AEMO, Inputs, Assumptions and Scenario Report 2023, July 2023, page 4.

In our view, the scenarios developed below comply with the requirements of the RIT-D application guidelines, noting that they describe different sets of states of the world that are relevant to the investment decision that is being addressed in this FPAR.

In relation to the identified need for relating to ILJIN overhead switch replacement program, it is evident that the proactive replacement of the identified assets is appropriate given the unacceptable risks of the 'do nothing' option. In addition, the absence of any alternative technological solution means that there are no credible alternatives to asset replacement.

5.3. Key variables and assumptions

Table 2 below lists the key variables and assumptions applied in the economic assessment, which are essential inputs to our methodology described above. The table also sets out the upper and lower bounds of the range of forecasts adopted for each of these variables. As explained above, the lower bound and upper bound estimates are used to undertake sensitivity testing and scenario analysis. For the expect cost of unserved energy, we have simplified the analysis by showing a lower and upper bound of 25% from the central estimate, which is a combination of changes in the demand forecasts, the probability of asset failure and the value of customer reliability that aggregate to +/ - 25% from the central estimate. The detailed results of this modelling are provided in the next section.

Table 2: Key variables and assumptions

Variable / assumption	Lower bound	Central estimate	Upper bound
Option cost	15% reduction in central estimate	In-house cost estimates using detailed and high-level project scope	15% increase in central estimate
Real discount rate per annum	3.0%	7.0%	10.5%
Expected cost of unserved energy	25% aggregate reduction in central estimate	Central demand forecast, probability of asset failure and VCR	25% aggregate increase in central estimate

5.4. Cost benefit analysis

The economic analysis shows the net economic benefit under the central case, and then if we vary the parameters: the capital cost of each option; the expected cost of unserved energy; and the discount rate. This analysis shows that the central case for Option 1 delivers a net economic benefit of $18.33 million compared to the 'do nothing' option, while Option 2 provides a net economic benefit of $15.20m. The finding, together with the sensitivity analysis is presented in the table below supports the adoption of Option 1, as it shows that Option 1 is preferred for each sensitivity.

Table 3: Net economic benefit for Central Case and sensitivity analysis ($M, nominal)

	Central Case	Increased capital costs	Lower capital costs	High unserved energy	Low unserved energy	High discount rate	Low discount rate
Option 1	18.33	8.19	13.69	18.25	3.62	1.95	18.67
Option 2	15.20	7.40	11.96	15.90	3.46	1.88	16.67

Source: AusNet

We have also conducted scenario analysis to further test this proposition, applying the parameter values and definitions set out below.

Table 4: Parameter values for each scenario

Scenario	Unserved energy	Option Cost	Discount rate
Central Case	Central estimate	Central estimate	Central estimate
Low demand	Lower bound	Lower bound	Lower bound
Weak economic growth	Central estimate	Lower bound	Lower bound
High demand	Upper bound	Upper bound	Upper bound

Table 5 below provides a brief description of each scenario.

Table 5: Scenario descriptions

Scenario	Description
Central Case	This scenario adopts the central estimate for each variable in the economic assessment. It represents the most likely outcome.
Low demand	This scenario tests the lower bound option for all parameters. It has lower expected unserved energy, lower costs of delivering the option and a lower discount rate.
Weak economic growth	This scenario reflects weak economic growth. It is characterised by lower costs of delivering the option and a lower bound discount rate. It adopts the central estimate for unserved energy, as the value of this parameter is assumed to be unaffected by weak economic growth.
High demand	This scenario tests the upper bound for all parameters. It is characterised by higher costs of delivering the option, higher demand and the upper bound discount rate.

The table below shows the net economic benefit for Option 1 and 2 compared to the 'do nothing' option. It shows that each of the options delivers a net economic benefit compared to the 'do nothing' option. Furthermore, Option 1 is superior for each scenario.

Table 6: Net economic benefit for each scenario ($M, nominal)

	Central case	Low demand	Weak economic growth	High demand
Option 1	18.33	12.13	21.49	4.19
Option 2	15.20	10.89	19.10	3.72

Source: AusNet

5.5. Preferred option

Option 1 is our preferred option, which is to replace 480 ILJIN manual switches with condition score 3 with combination of NGK and Schnieder Electric switches. This option is strongly supported by the cost benefit analysis presented in the previous section. In accordance with the NER requirements, Option 1 is expected to maximise the present value of the net economic benefit to all those who produce, consume and transport electricity in the NEM.

In terms of the technical characteristics, as already noted, the preferred option is to replace existing manual switches that are in poor condition. The effective delivery of the preferred option requires AusNet to manage the following risks:

- Supply constraints due to global shortage of materials;
- Outage planning to replace switches through early planning and co-ordination; and
- Greenhouse gases and waste – mitigated by SF6 contents of switches 90% of SF6 gas will be recycled and a small portion (10%) will be disposed as waste.

5.6. Capital and operating costs of the preferred option

The direct capital expenditure is $17.74 million (nominal). The principal capital expenditure elements, expressed in nominal terms, are:

- Design and internal labour, $0.91 million;
- Materials, $4.42 million; and
- Contracts, $10.80 million.

The remaining costs relate to overheads and an allowance for risk.

For the purposes of this RIT-D, it is assumed that the operating expenditure is unchanged from the 'BAU' costs.

In relation to the timetable for completing the works, we expect the replacement program to commence in February 2024 and the project In-service date is expected to be 31 March 2025.

6. Satisfaction of the RIT-D

In accordance with clause 5.17.4(j)(11)(iv) of the NER, we certify that the proposed preferred option satisfies the regulatory investment test for distribution. The table below shows how each of these requirements have been met by the relevant section of this report. As no submissions were received in response to the DPAR, 5.17.4(r)(1)(ii) is not applicable for this FPAR.

Table 7: Compliance with regulatory requirements

Requirement			Section
5.17.4(j) The draft project assessment report must include the following[6]:			
(1)		a description of the identified need for the investment;	Section 2.2.
(2)		the assumptions used in identifying the identified need (including, in the case of proposed reliability corrective action, reasons that the RIT-D proponent considers reliability corrective action is necessary);	Section 2.3.
(3)		if applicable, a summary of, and commentary on, the submissions on the non-network options report;	Not applicable.
(4)		a description of each credible option assessed;	Section 4.
(5)		where a Distribution Network Service Provider has quantified market benefits in accordance with clause 5.17.1(d), a quantification of each applicable market benefit for each credible option;	Section 5.4.
(6)		a quantification of each applicable cost for each credible option, including a breakdown of operating and capital expenditure;	Sections 5.4 and 5.5.
(7)		a detailed description of the methodologies used in quantifying each class of cost and market benefit;	Section 5.2.
(8)		where relevant, the reasons why the RIT-D proponent has determined that a class or classes of market benefits or costs do not apply to a credible option;	Section 5.1.
(9)		the results of a net present value analysis of each credible option and accompanying explanatory statements regarding the results;	Section 5.4.
(10)		the identification of the proposed preferred option;	Section 5.5.
(11)		for the proposed preferred option, the RIT-D proponent must provide:	
	(i)	details of the technical characteristics;	Section 5.5.
	(ii)	the estimated construction timetable and commissioning date (where relevant);	Section 5.6.
	(iii)	the indicative capital and operating cost (where relevant);	Section 5.6.
	(iv)	a statement and accompanying detailed analysis that the proposed preferred option satisfies the regulatory investment test for distribution; and	Section 6, including this table.
	(v)	if the proposed preferred option is for reliability corrective action and that option has a proponent, the name of the proponent;	Not applicable.

[6] Although this provision refers to the draft project assessment report, it is applicable to this FPAR by virtue of clause 5.17.4(r)(1).

Requirement		Section
(12)	contact details for a suitably qualified staff member of the RIT-D proponent to whom queries on the draft report may be directed.	Section 1.3.

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