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Submission to the Supplementary Analysis Report released for Marinus

UPC\AC Renewables (UPC) welcomes the opportunity to provide feedback on the supplementary information for the RiT-T process for Marinus Link.

UPC congratulates TasNetworks on the effort to address concerns raised by the numerous submissions received and to align the analysis to that of the AEMO 2020 ISP. It is encouraging that with all this extra analysis, the case for Marinus continues to strengthen.

From a developers perspective the clear questions now relates to the timing of the Marinus development and the cost allocation methodology. While the latter is being assessed by the Energy National Cabinet Reform Committee we would encourage TasNetworks to continue to promote the beneficiary pays model for cost allocation related to interconnectors.

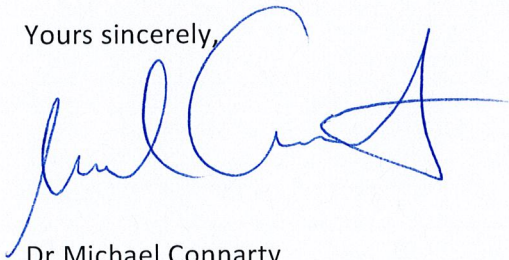
In terms of the timing of Marinus Link, UPC would advocate that it is developed as soon as possible, as UPC believes the market benefits will be realised the earlier Marinus is operational. The preferred timing of 2027 reflects an idealistic world of just in time investment, the reality is just in time typically reflects far too late. Being able to deliver Marinus earlier would also mean more encouragement to develop the renewable energy projects in Tasmania early and in a more realistic time frame to help delivery the recently legislated Tasmanian Renewable Energy Target (TRET).

UPC also considers that with recent policy announcements in NSW (NSW roadmap), the Victorian and Queensland budgets that promote the development of renewable energy zones, the NEM is closer to the step change scenario in the 2020 ISP assumptions. The likely increasing rate of uptake of renewables will put more pressure on coal plant leading to earlier closure of such plant, resulting in the need for alternative energy and capacity sources like Marinus sooner.

UPC considers Marinus can be delivered by 2026. This timing is based on the progress of two HVDC interconnectors in Europe, NorthSea Link and Viking Link, which are twice the length of Marinus, with development time frames of 3 years, compared to 4+ years being assumed for Marinus. Also based on the Basslink time frames of 3 years to deliver and lay the cables, it is difficult to see why Marinus would take considerably longer. With the work already progressed being able to finalise design and approvals and then laying the cable should be possible in the next 5 years resulting in delivery in 2026. UPC would encourage TasNetworks to look at ways to progress the development at a faster pace and bring it on line as early as possible, preferably before 2027.

As always, we are happy to discuss these observations and suggestions with you at your convenience.

Yours sincerely,



Dr Michael Connarty
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