



17/01/2020

Dr Kerry Schott AO  
Chair  
Energy Security Board

Via electronic lodgement: [info@esb.org.au](mailto:info@esb.org.au)

Dear Dr Schott,

**Re – Converting the Integrated System Plan into action: Consultation on Draft ISP Rules**

Mondo appreciates the opportunity to comment on the Energy Security Board's (ESB) "Converting the Integrated System Plan (ISP) into action- Consultation on the Draft ISP Rules" document.

Mondo provides a variety of contracted transmission and distribution services, including grid connections for new generators, battery energy storage systems and aggregation of distributed energy resources.

Mondo broadly supports the Australian Energy Market Operator's (AEMO) ISP process and is also supportive of the ESB draft rules to action the ISP.

Given the fast pace of change within the electricity sector and the need to replace large coal fired power stations with new generation sources with resources concentrated at new locations, there is clearly a need to find more streamlined methods for identifying, assessing and developing network solutions. For this reason, Mondo supports the proposal that the ISP effectively replace the current Project Specification Consultation Report stage of the RIT-T, and that TNSPs be required to publish the Project Assessment Draft Report within six months of the ISP publication.

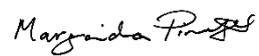
The proposed ISP purpose (section 2.2.1 in the consultation paper) includes "public policy needs", which may incorporate State and Federal government environmental and energy policies. Mondo supports the intent of this proposal, but suggests that including public policy as a component of power system needs may not be the best approach. Rather than include public policy needs as part of the power system needs, it perhaps would be better to express the ISP purpose as "to meet the power system and public policy needs ..", with the power system needs then defined as market reliability, transmission reliability and power system security.

**Bright future.**

Mondo agrees with the proposal that stakeholders are able to respond to the draft ISP with non-network options, as this will be important to ensure that all viable options, both network and non-network, are adequately considered. This will become more important as new technologies become more cost effective.

Mondo hopes that the comments contained in this submission are of assistance to the ESB in its deliberations on this consultation. Please do not hesitate to contact either myself or Chris Deague on [chris.deague@mondo.com.au](mailto:chris.deague@mondo.com.au), or phone 0417 549 583 if you have any further inquiries.

Yours sincerely



**Margarida Pimentel**

**Manager Policy and Aggregation Services**