









OFA Transitional Access

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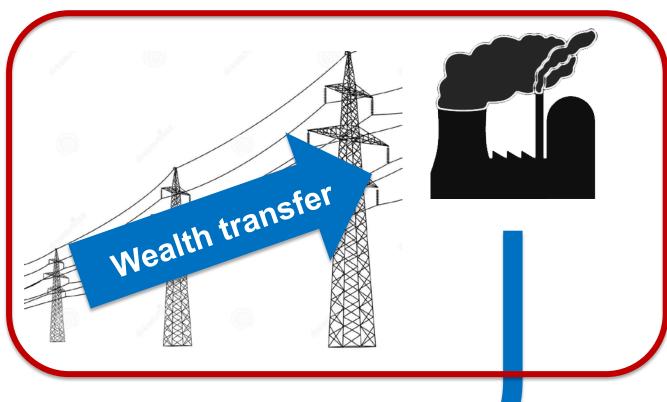
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Minimising wealth transfer

It is in consumers best interests to minimise any allocation of free access.









Reasons to give free access

1. Learning period

Justifies providing access for a very short period (2-3 years)

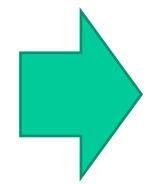
2. Minimise perceptions of regulatory risk

- Prevent inflation in the cost of capital
- BUT conventional approach may not apply at the cusp of a technology transition

Perceptions of risk are nuanced

Financiers assess risks of different technologies differently

Most new entrants will be renewables and peakers



Is the treatment of old, emissions intensive generators considered important when determining financing of renewables and peakers?

If it is important, then how?

Perception of desire to protect existing emissions intensive assets in preference to supporting new entrants



Elevates cost of capital for renewables?

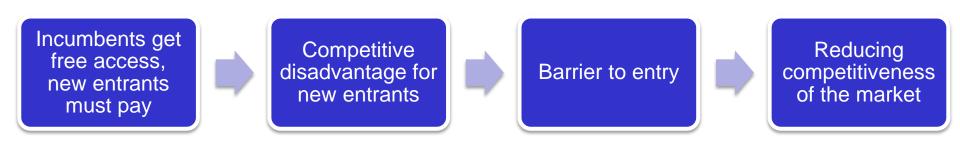
- Further analysis required
 - Understand nuances of financiers perceptions of risk
- Proposing a potentially large wealth transfer
 - For sole purpose of minimising cost of capital
- What is optimal approach to minimise cost of capital for new entrants, while minimising wealth transfer?

Barriers to entry

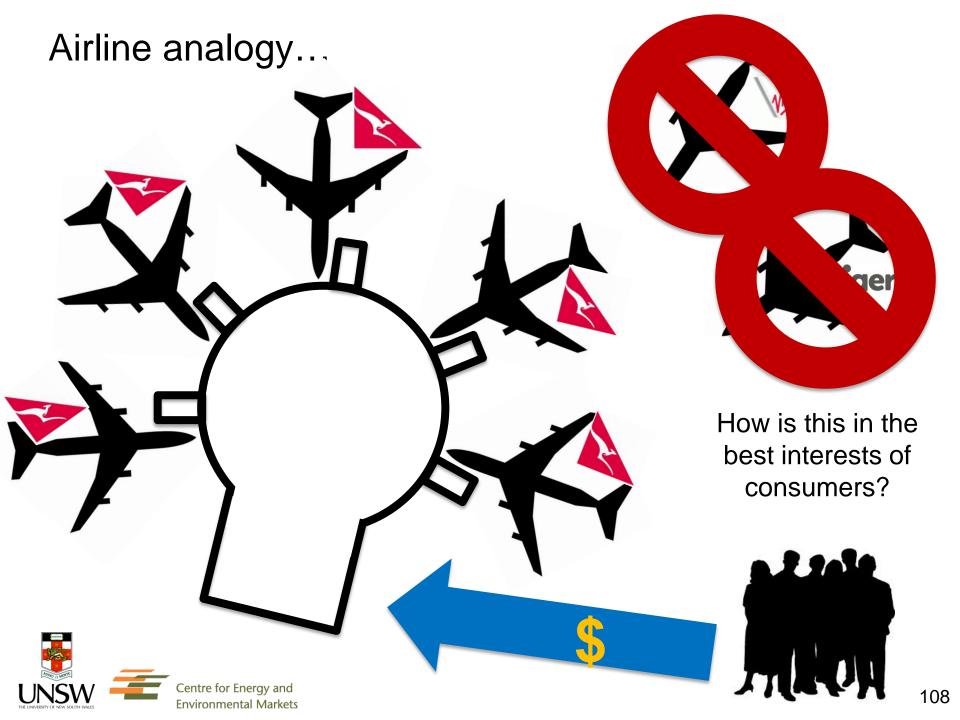
American Economic Review:

"An economic barrier to entry is a cost that must be incurred by a new entrant and that incumbents do not or have not had to incur"

R. Preston McAfee, Hugo M. Mialon and Michael A. Williams, "What is a Barrier to Entry", American Economic Review, Vol. 94 No. 2 (May 2004)

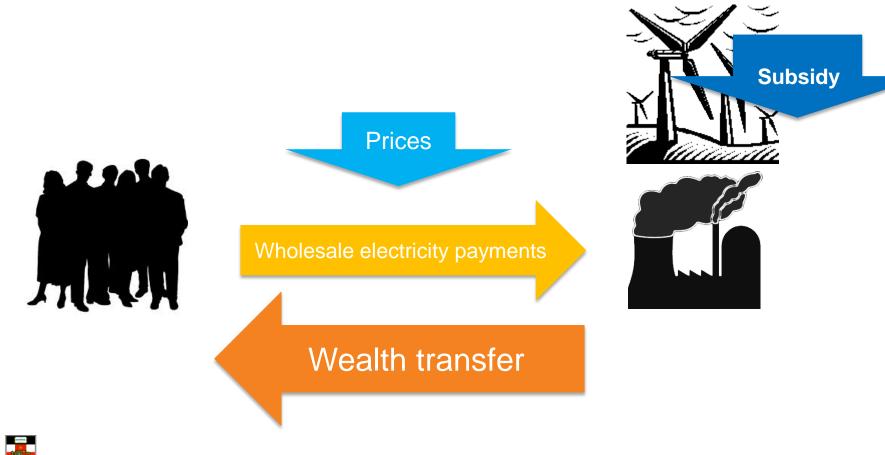






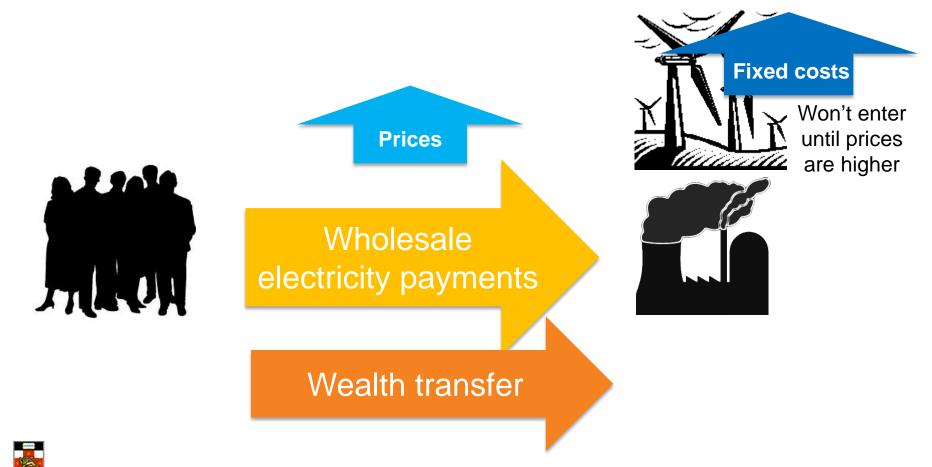
The Merit Order Effect

 Subsidy for new entrants creates a wealth transfer from existing generators to consumers, via depressed wholesale prices



The Reverse Merit Order Effect

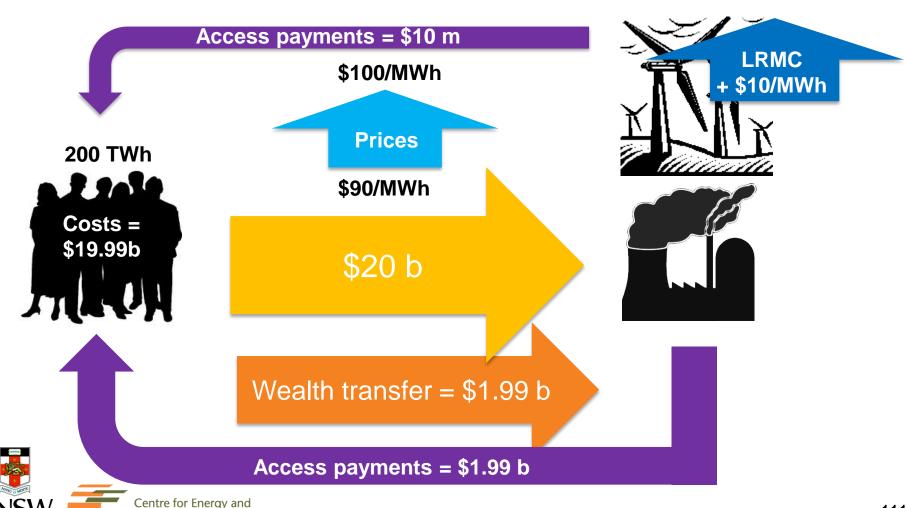
 Competitive disadvantage for new entrants creates wealth transfer from consumers to existing generators, via inflated wholesale prices



The Reverse Merit Order Effect

Environmental Markets

 Competitive disadvantage for new entrants creates wealth transfer from consumers to existing generators, via inflated wholesale prices



Conclusion - Further analysis required

TNSP to quantify access pricing

- Indicative access pricing numbers to facilitate further analysis and modelling
- Trial of LRIC methodology

Determine impacts on cost of capital

- Examine impact of different transitional access approaches
- Find the minimum total allocation, and way of allocating, that minimises cost of capital specifically for renewables and peakers

Modelling of price and entry/exit impacts

- Explore impacts of different transitional access approaches on wholesale prices, and entry/exit decisions
- Understand competitive disadvantage issues

Alternatives to consider:

No free access (to anyone)

Give equal access to new entrants (remove competitive disadvantage)

Give transitional access to renewables and peakers only (not to coal-fired generators)







Thank-you

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