



Powering ahead: Progressing the SWIS transition

Australian Energy Council
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Baringa acknowledges the Traditional Custodians of the lands on which we work. We acknowledge their continuing connection to land, sea and sky. We pay respect to them and their Elders past and present; and acknowledge the peoples as the oldest continuous living culture in the world.

We acknowledge the land that we work on as the traditional lands of the Gadigal people of the Eora Nation (Sydney) and the Wurundjeri Woi-wurrung people of Narm (Melbourne).

We're thankful to the custodians for caring for this land for more than 60,000 years and teaching us how to stay sustainably connected to the land, sea and community.



Executive summary

Introduction

The energy transition is afoot across Australia as governments commit to reducing emissions from the electricity sector by transitioning away from legacy coal generation towards a mix of renewable energy, storage and peaking generation. Maintaining electricity system reliability, security and affordability through this transition requires proactive long-term planning to ensure that enabling infrastructure like the transmission network is developed when and where needed to unlock new renewable energy capacity.

The Government of Western Australia (WA), through the state-owned gentailer Synergy, has committed to closing most of the state's coal fleet by 2030, a commitment which was reaffirmed in the State Budget in June 2025. Significant investment is required in new transmission, generation and storage infrastructure to ensure the affordability and ongoing reliability and security of the system as it transitions away from coal.

Baringa was engaged by the Australian Energy Council (AEC) to provide an independent view on the risk of electricity transition delay in the South-West Interconnected System (SWIS). Through this engagement, we have undertaken quantitative analysis of the potential market impacts of a delayed build-out of the transmission network in the SWIS. We have also considered the current transmission planning and policy frameworks in the SWIS, the extent to which these are fit-for-purpose to enable the transition, and the opportunities for improvement.

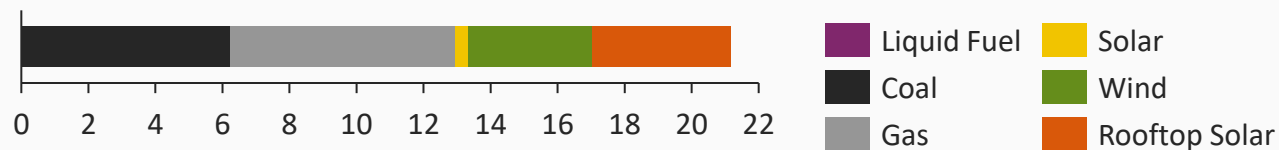
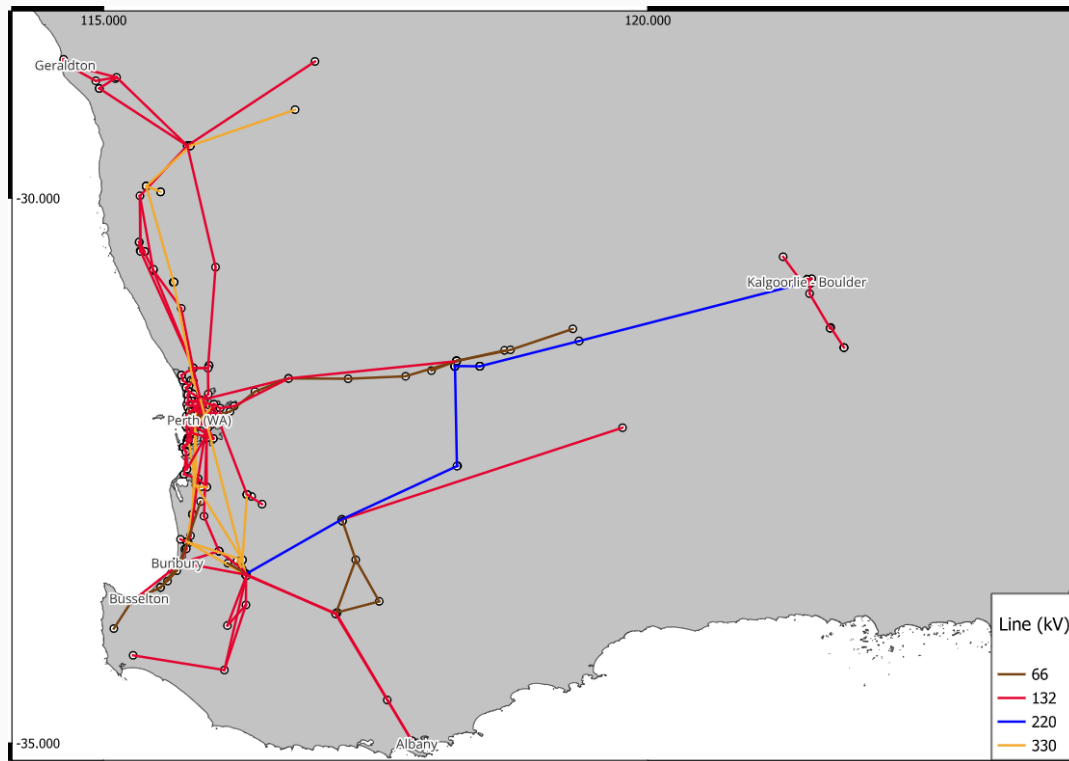
Our work provides an indication of the potential impacts of transition delay in the SWIS, and highlights the opportunity to revise the system planning framework, in particular, to set the transition pathway and enable its delivery.

Key findings

- Our analysis finds that a **delay to transmission build-out in the SWIS of even just one year will push up prices for consumers and elevate electricity sector emissions**. This is driven by a greater dependence on gas because fewer new renewable energy projects can connect.
- Further, we find that if the transmission build-out is assumed to be **delayed by three years, electricity supply becomes increasingly tight** with a very high dependence on gas generators, pushing up prices and emissions, and increasing the risk of energy shortfalls.
- A number of important changes have been implemented in the SWIS transmission planning and policy framework over the last few years, in an effort to better align with the needs of the transition. However, in our view the framework is still not fit-for-purpose to provide certainty to the market on delivery of a timely energy transition.
- While we have considered opportunities to improve the planning and policy framework across a number of policy areas, we consider that the priority is long-term planning. **Introducing a single, credible, long-term system plan which identifies a 'central' transition pathway that all key stakeholders are aligned on is critical to guide investment and development**. While this would only be the first step in bringing forward the required investment, we expect that further improvements to the investment framework, grid connections, and other policy areas would be facilitated by this initial step.
- The SWIS has a lot of strong frameworks in place and clear ambition to decarbonise. Leveraging the existing strengths and undertaking reforms where needed will help to progress the energy transition in the interests of affordability, reliability and security for consumers.

SWIS transition overview

The South-West Interconnected System relies on coal and gas generation to meet demand, with increasing contributions from renewables and storage



Annual generation, GWh*

*Generation data taken from 04/05/2024 to 05/05/2024. BESS generation has been excluded.

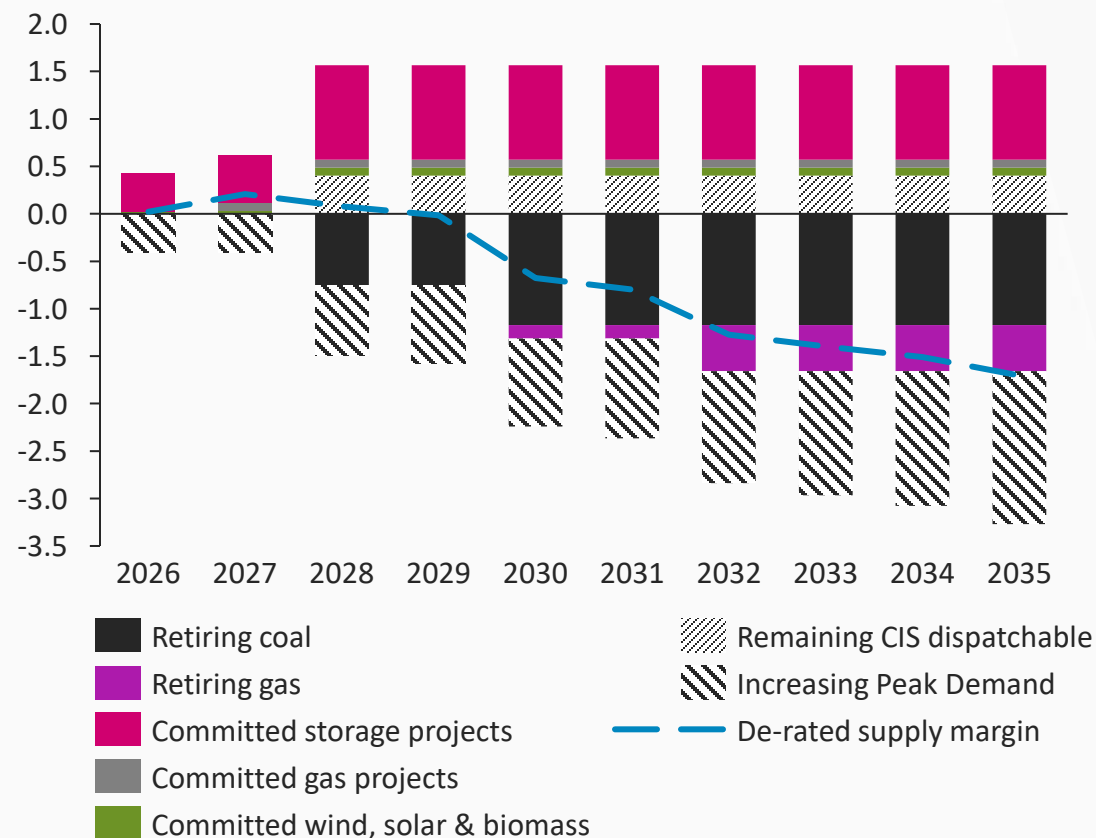
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- The South-West Interconnected System (SWIS) supports approximately 17 TWh of annual operational demand, with a peak operational demand of 4 GW. The Wholesale Electricity Market (WEM) consists of generators and consumers which are connected to and operate across the SWIS.
- Coal and gas make up the bulk of generation, contributing 29% and 32% to the underlying generation mix across 2024-2025 respectively. The level of wind penetration has been increasing, currently contributing 17% to the generation mix.
- The first utility-scale battery energy storage system (BESS) in the SWIS was energised in 2023 and has been followed by the deployment of several large-scale BESS projects. Total utility scale storage capacity in the SWIS is approximately 520 MW/1600 MWh and is expected to reach 1.5 GW/5.2 GWh across FY26.
- Rooftop solar uptake for SWIS consumers has been high, with rooftop solar generation meeting just over 80% of underlying demand for a single interval in November 2024 (a record value). Accounting for rooftop solar, annual underlying demand is approximately 21 TWh.
- The SWIS spans a large geographical area, consisting of nearly 8,000 km of transmission lines which supply electricity as far as Geraldton, Albany and Kalgoorlie.
- The majority of thermal generation is located south of Perth, near Kwinana and Collie. Wind generation is largely concentrated in the region north of Perth, an area of the SWIS which has historically seen congestion and technical curtailment. There are also existing and planned wind farms in the Southeast region.
- The State Government has a legislated long-term target of net zero emissions by 2050.

Retirement of the coal fleet and rising demand will leave a firm capacity supply gap if new generation capacity is not deployed

Derated Supply Margin Delta from 2025

Derated capacity, GW



Expected shortfalls

- The left-hand figure presents the positive and negative contributions to the derated supply margin, with respect to 2025 values (noting the 2025 WEM ESOO projects a 50 MW shortfall in 2025-26).
- The 2025 WEM ESOO identifies a growing supply gap from 2027-28. The inclusion of firm storage capacity underwritten by the Capacity Investment Scheme (CIS) will help narrow the gap, but will not prevent a material shortfall appearing from 2030.
- Whilst further storage deployment will contribute to closing the supply gap, storage acts as a net load on the system. Additional generation, from both existing and new plants, will be required to meet rising annual demand requirements.

Coal closures

- The majority of the coal fleet is owned and operated by the state-owned gentailer Synergy. The WA Government, through Synergy, has committed to the closure of their coal plants by 2030. This is a key driver for decarbonisation of the SWIS in the short-term.
- Bluewaters Power Station is the only privately owned coal plant in the SWIS. AEMO's 2025 WEM ESOO assumes that the plant will close by October 2027, following the end of state funding for its coal supplier, Griffin Coal. There is a possibility that a new agreement is reached between Bluewaters and Griffin Coal, allowing the plant to operate beyond 2027.

Demand set to increase

- SWIS demand is expected to rise over the next decade, in part driven by residential, business and industrial electrification. The production of green hydrogen may also act as a key driver for increasing demand, with both the State and Federal governments committed to developing the green hydrogen industry.

Source: Base Case, AEMO 2025 WEM ESOO. Assumed Capacity Credit assignment for new projects. Note Baringa's committed classification differs to AEMO ESOO and inclusion of CIS dispatchable volumes.

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Significant transmission network investment is required in the SWIS to allow for the connection of new generation to serve rising demand and replace coal generators



- Significant transmission network investment is required in the SWIS to enable new generation projects to connect, to meet rising demand and to replace the closing thermal generation. New transmission network can unlock capacity for new projects and reduce constraints on the existing network.
- The requirements for several transmission projects were identified at a high level in the SWIS Demand Assessment (SWISDA), published by the State Government in May 2023.
- The SWISDA outlined the first major transmission project in the SWIS, now named Clean Energy Link – North. Scopes of work include upgrading 132 and 330 kV lines between Perth North Terminal and Three Springs, with over \$1bn in total funding now allocated by the State Government.
- The delivery of Clean Energy Link – North presents a challenge for Western Power, with the project being the first major transmission upgrade in over a decade.
 - The SWISDA proposed an ambitious 2027 delivery target for Clean Energy Link – North. Delivery by 2027 is unlikely, with Western Power’s 2024 Transmission System Plan (TSP) stating a circa 2028 completion date. The 2025 WEM ESOO has also delayed implementation by a year in comparison to the 2024 projections.
 - The challenge is also highlighted by a proposal to extend Western Power’s existing Access Arrangement, which expires on 1 July 2027, by 12 months to allow for learnings from the delivery of Clean Energy Link – North to be implemented in the proceeding Access Arrangement.
- The SWIS Transmission Planning Update was published in May 2024, superseding the SWISDA and establishing the Clean Energy Link Programme. However, the publication contained very little detail on the timing, line routes and scopes of work for the additional projects. Other sources of information, such as Western Power’s 2024 Transmission System Plan, similarly include minimal detail.

Transmission network uncertainty is a key risk area for new development in the SWIS

Key risks and areas of uncertainty for development assets



Investment uncertainty due to ongoing market reform and changing RCM requirements



Transmission build and access



Level of demand and offtake



Increasing competition with distributed energy resources

- Both new load and new generation assets connecting to the SWIS face several areas of uncertainty and risk. Uncertainty on the timing, location and details of transmission build is a key risk, as is securing a grid connection and gaining access to the network.
- Many recently committed and energised generation projects are connected to parts of the SWIS where existing capacity is retiring and the network is already well enforced, such as Collie and Kwinana.
- As additional generation connects to the SWIS, the existing network will become increasingly congested.
- The impact of increasing levels of congestion can already be seen in the published Network Access Quantities (NAQs) for the 2026-27 Capacity Cycle, which act as a measure of network access for participants when determining their Capacity Credit assignment. The Synergy Collie BESS received a NAQ reduction of 30%, effectively reducing Capacity Payments by the equivalent amount.
- Without further transmission build, NAQs would be expected to continue to decline and would likely impact the business case for new investment, putting the ongoing energy transition at risk.

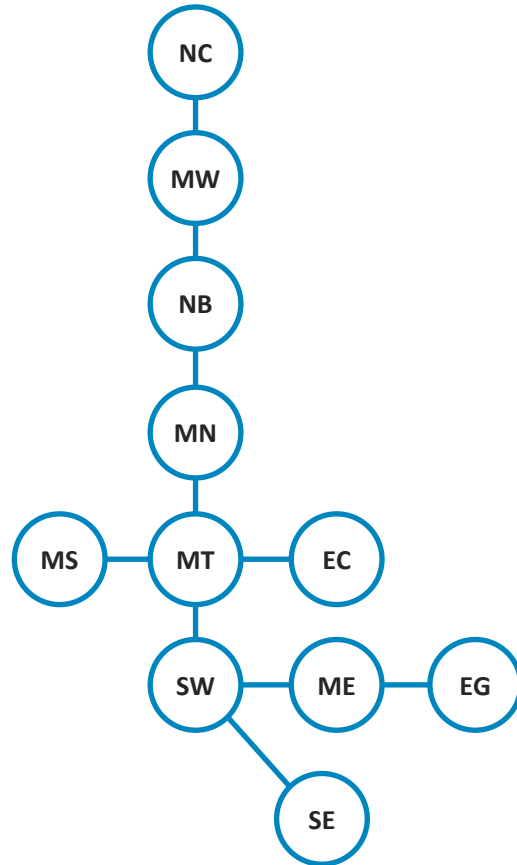
In addition to creating uncertainty for investors, a delay to the energy transition in the SWIS risks complicating engagement with communities and undermining social licence for the transition broadly. As experienced in the NEM, shifting timelines, locations and a general lack of clarity can result in uncertainty for the communities expecting to be impacted and may create challenges to maintaining social licence. The WA state government established PoweringWA in 2023 to coordinate transmission projects and speed up the process. This entity aims to coordinate between other bodies to ensure smoother project progression, including significant community engagement.

Impacts of transition delay



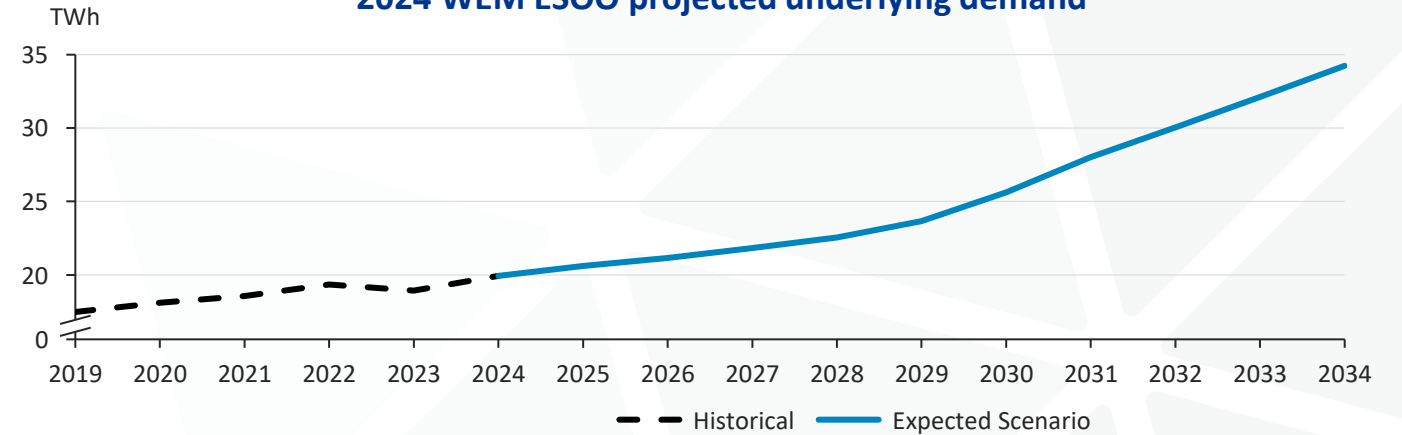
A zonal representation of the SWIS was used to capture the impacts of transmission build delays

Zonal representation of the SWIS



Northern Region: *Mid West (MW), Neerabup (NB) and North Country (NC)*
 Metro Region: *Metro (MT), Metro North (MN) and Metro South West (MS)*
 Eastern Region: *East Country (EC), Mid East (ME) and Eastern Goldfields (EG)*
 Southern Region: *South East (SE) and South West (SW)*

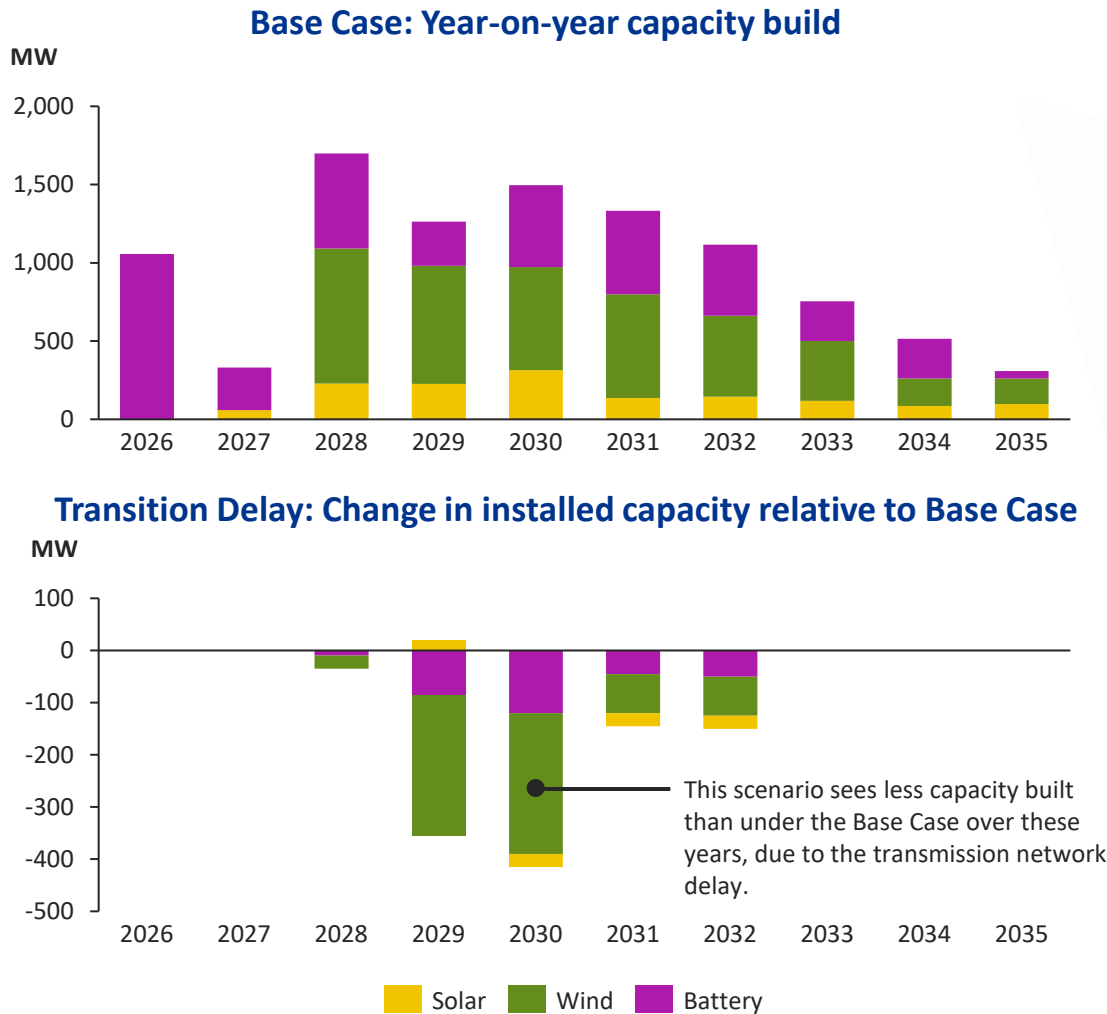
2024 WEM ESOO projected underlying demand



- The SWIS has been modelled under a zonal representation, with transfer limits between zones which reflect transmission build. Long-term generation capacity build-out is then also considered on a zonal basis, capturing the impact of transmission upgrades on maximum zonal build and curtailment.
- All input assumptions are held constant between the Base Case and Transition Delay scenarios, except for transmission build and the resulting long-term generation capacity build-out.
- Underlying demand, rooftop solar and distributed battery projections are derived from the Expected scenario in AEMO's 2024 WEM ESOO.
- Gas and coal plant closure date assumptions are consistent across both scenarios. Synergy coal plants retire as per announced dates and existing gas plants retire based on plant age. Planned and forced outages of gas and coal plants have been considered in both scenarios.
- Baringa's commodity price projections for gas and coal have been used in both scenarios.



To understand the impact of transition delay, we have modelled the market with a one-year delay to transmission build-out and compared this with a Base Case



Transmission build assumptions

	Assumed build date – Base Case	Assumed build date – Transition Delay
Clean Energy Link (North)	July 2027 – July 2028	July 2028 – July 2029
Clean Energy Link (South)	July 2030 – July 2031	July 2031 – July 2032
Clean Energy Link (East)	July 2031 – July 2032	July 2032 – July 2033

- To capture the impacts of delayed transmission buildout in the SWIS, we have compared two modelled scenarios – a Base Case and a Transition Delay scenario.
 - Timing of transmission upgrades in the Base Case is what we consider the industry ‘best view’ based on publicly available information and market knowledge.
 - Under the Transition Delay scenario, all transmission build has been delayed by one year relative to the Base Case. The table above highlights the assumed timing of key transmission projects across the two scenarios.
- Long-term capacity build in both models is built on an economic basis, with consideration of transmission limits and curtailment impacts.
- Delaying transmission build reduces the deployment of new renewable and storage capacity. Between 2028 to 2032, there is up to 400 MW reduction in capacity under the Transition Delay scenario.

Results are presented on a financial year basis. Modelling was conducted prior to the release of the 2025 WEM ESOO, with the assumption that Bluewaters Power station retires across FY2031-2032 under both scenarios.
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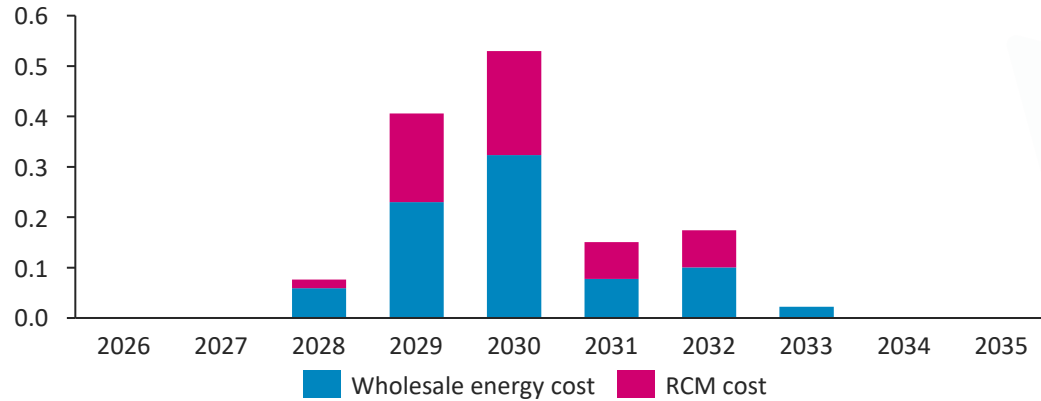




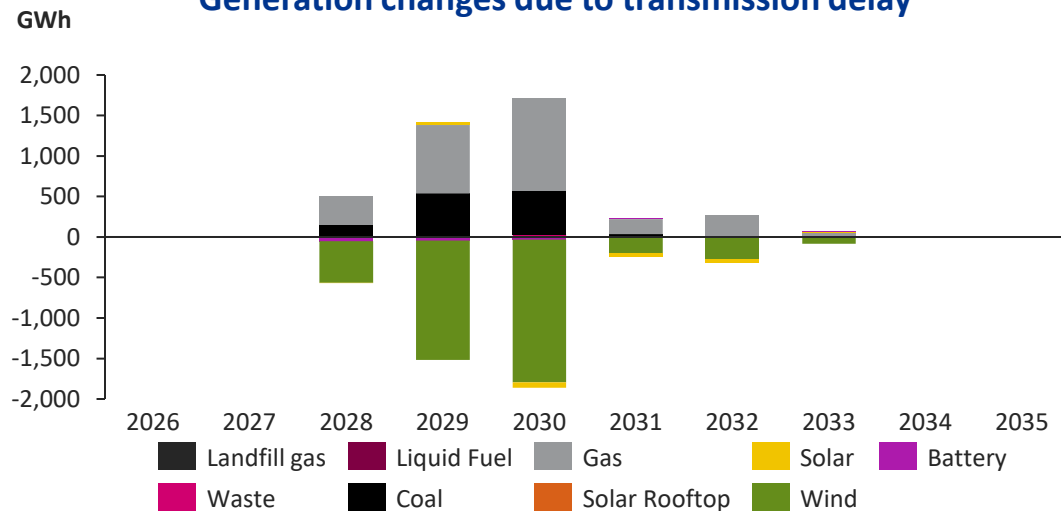
A single year of delay in transmission build could increase consumer costs by \$1.4 billion across 2028-2033

Increased consumer costs due to transmission delay

\$bn (real 2024)



Generation changes due to transmission delay



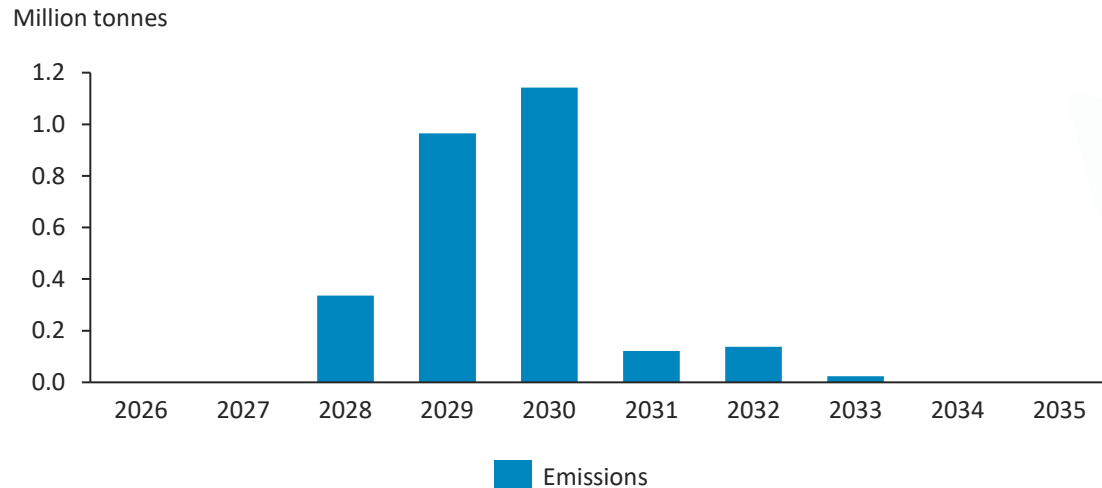
Commentary

- We have estimated the consumer impact of transmission delay by calculating the difference in wholesale costs (cost to serve demand) and Reserve Capacity Mechanism (RCM) costs, between the Transition Delay and Base Case scenarios.
- A one-year delay in transmission build is estimated to increase total consumer costs by \$1.4 billion across 2028-2033.
- Delays to transmission development are found to slow renewables build-out and increase curtailment, reducing the total volume of generation from renewables. The volume of generation from coal and gas increases to fill the gap, resulting in higher energy prices as thermal generation more frequently sets the price.
- Higher wholesale energy prices contribute 60% to the total cost increase, which corresponds to a 3-12 \$/MWh uplift in annual baseload prices.
- Capacity Prices, and hence the RCM cost, are very sensitive to small changes in total Capacity Credit assignment. A reduction in capacity build, particularly storage, results in higher Capacity Prices and an increase in RCM costs.
- The cost impact is greatest in 2029 and 2030, driven by the delays to Clean Energy Link – North and South. The delays to Clean Energy Link – East are less impactful, as capacity which was built in the Eastern Region under the Base Case is instead built in the Northern and Southern Regions.
- Additional factors were not modelled but could act to further push up consumer costs:
 - Increased commodity prices driven by greater fuel demand from generators
 - Decreasing reliability of the thermal fleet due to additional generation
 - Impacts on FCESS pricing
 - Decreased investor confidence and resultant delays to generation development even after transmission is built.
 - Implications of delayed generation capacity on the connection of new load



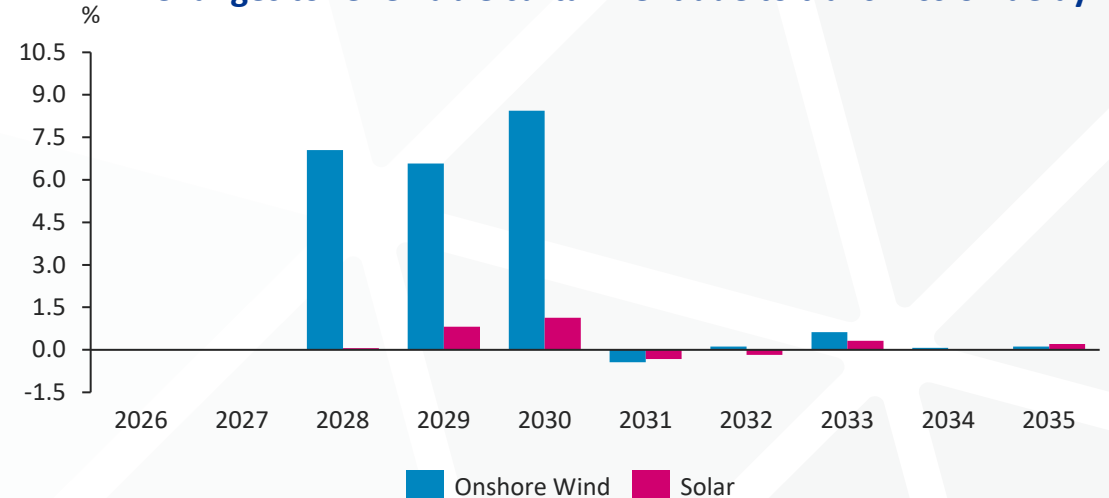
A single year of transmission delay could result in 2.7 million tonnes of additional CO₂ emissions and an increase in annual wind curtailment of up to 8%

Increased CO₂ emissions due to transmission delay



- As thermal generation increases to compensate for displaced renewable generation, production of carbon emissions also increases.
- The delay of transmission build results in an additional 4 TWh coal and gas generation over 2028-2033, which translates to 2.7 million tonnes of additional CO₂ released.

Changes to renewable curtailment due to transmission delay



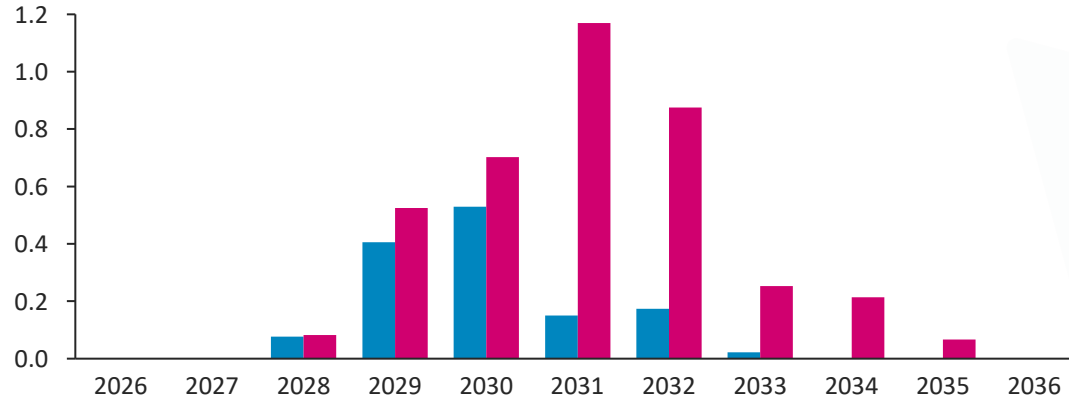
- Without timely upgrade of the grid, increase of curtailment of renewables is foreseen from 2028-2030 with up to 8% curtailment for wind and 1% curtailment for solar on top of curtailment levels in the Base Case.
- The increase in curtailment is mainly driven by more frequent line congestion in the Northern and Southern regions, as new build generation in these regions increases to serve rising demand. This increases power flows on the existing lines which more frequently reach their thermal rating without augmentation.
- By 2031, curtailment eases as the Clean Energy Link (North) and Clean Energy Link (South) network upgrades are energised. The delay in Clean Energy Link (East) has a smaller impact as the long-term generation capacity build is shifted from the East to the Northern and Southern regions, after additional capacity is unlocked by the initial Clean Energy Link augmentations.



We further stress-tested the system with a 3-year delay in transmission build, which could increase consumer costs by \$3.9 billion and emissions by 6.84 million tonnes

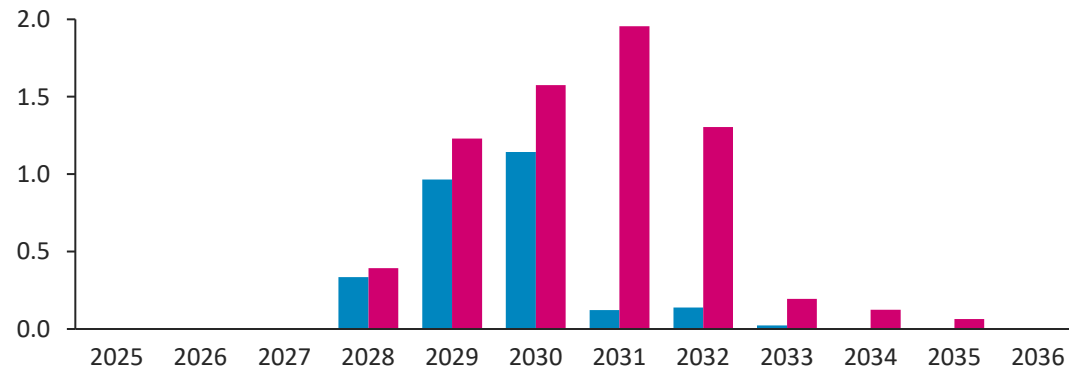
Increased consumer costs due to transmission delay

\$bn (real 2024)



Increased CO₂ emissions due to transmission delay

Million tonnes



■ One-year delay ■ Three-year delay

Commentary

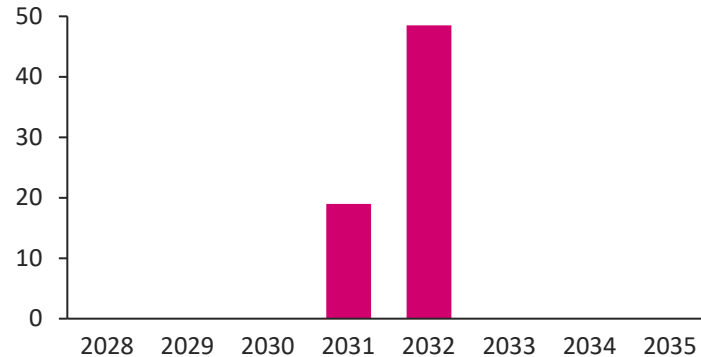
- To further test the impact of transmission delays, an additional sensitivity was modelled introducing a three-year delay to transmission build. Long-term generation capacity build-out was also adjusted in the three-year delay scenario on an economic basis.
- Delaying transmission build by three years reduces long-term capacity build and increases the reliance on thermal generation in comparison to the one-year delay scenario. Transmission limits and high levels of curtailment prohibit the deployment of new capacity.
- As a result, consumer costs increase further due to higher energy and capacity prices, representing a \$3.9 billion increase in comparison to the Base Case across 2028-2035.
- Emissions also increase significantly in the three-year delay scenario in line with the increase in thermal generation, with an additional 6.84 million tonnes of CO₂ production across 2028-2035 in comparison to the Base Case.



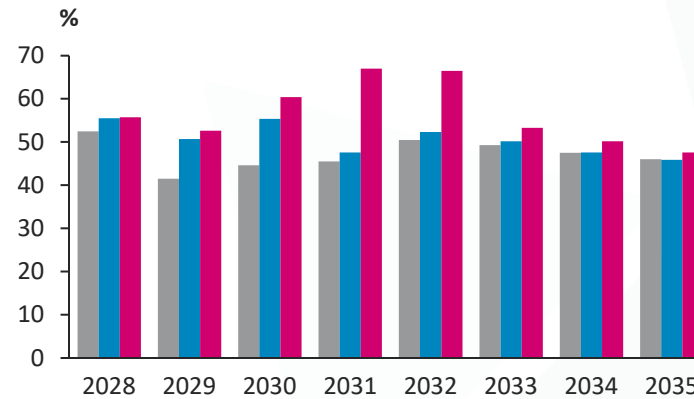
Thermal generators have to run harder with longer network build-out delays, introducing a potential risk to system reliability

Hours of gas fleet utilisation >90%

Hours per year



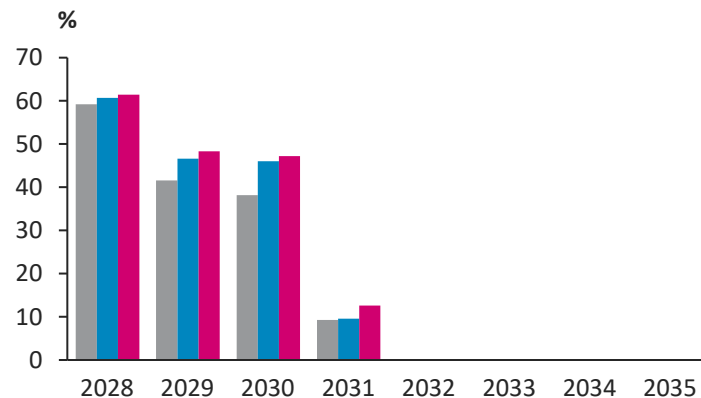
CCGT capacity factors



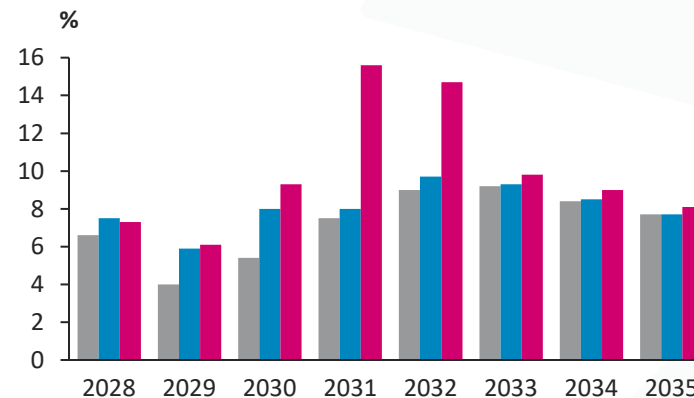
Commentary

- Thermal generator utilisation increases significantly when network delays are introduced, limiting new capacity build. Thermal generation increases to fill the gap created by retiring coal and increasing demand.
- The increase in capacity factors (which effectively reflect how hard the generators are running) is most notable under the three-year delay sensitivity, with CCGTs reaching a 67% annual capacity factor. Similarly, OCGT plants play less of a 'peaking' role, with capacity factors reaching up to 16% (an average of 4 hrs per day).
- The increased running hours and output of the thermal fleet could increase generator wear and tear. This could lead to increased outages and reliability issues, which has not been accounted for in our modelling.
- The system is tight under the three-year delay sensitivity, with an increasing number of hours where available capacity is limited in comparison to demand. This is highlighted by the top-left plot which presents the number of hours per year in which the total gas fleet utilisation exceeds 90%.
- Baringa's modelling uses POE50 demand, which is more conservative than POE10 demand used in AEMO's WEM ESOO modelling. Thus, under higher demand conditions, the system would be even tighter, further risking security of supply and unserved energy.

Coal capacity factors



OCGT capacity factors



Base case One-year delay Three-year delay

Planning for the transition

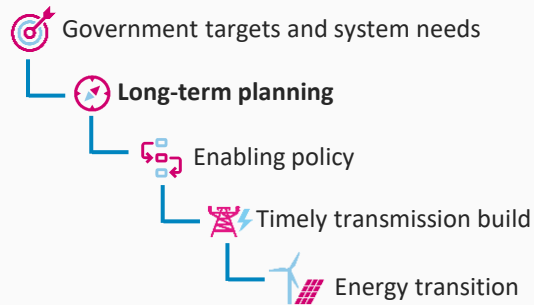
Given the potential costs and reliability risks for WA consumers in the event the energy transition is delayed (even by a single year), it is important to ensure the appropriate planning and policy settings are in place to facilitate a timely transition and reduce the risk of delay.

This Section of our report examines whether the current planning framework is fit-for-purpose to deliver a timely transition, and identifies opportunities for improvement.



Fit-for-purpose long-term system planning is essential to support the timely delivery of major new transmission projects in the SWIS and support the transition

Long-term planning is critical to the energy transition



- Getting the initial long-term planning arrangements right is critical to enabling a timely, coordinated, transition in the SWIS.
- While the subsequent enabling policy areas identified in this report – actioning the plan, certainty of cost recovery, efficient and coordinated grid connection – are all important, **getting the long-term system planning framework right is the most step critical to progressing the transition.**
- Without a commonly accepted plan to provide direction, a coordinated and timely energy transition becomes harder to deliver with the risk of detrimental outcomes for energy security, reliability, affordability and sustainability.
- The critical role of system planning has been recognised elsewhere in Australia. Other states and markets including the National Electricity Market and the governments of NSW, Victoria, Queensland and Tasmania have progressed substantial programs of work to better facilitate the timely delivery of transmission network infrastructure to facilitate the energy transition. In each case, a revised planning framework has been an important feature with enabling policy developed to support delivery of the plan.

Policy Area



Long-term planning

Policy Objectives

- Single, commonly accepted, long-term system plan.
- Robust and credible in the market, driven by requirements for transparency of modelling, inputs and assumptions, and genuine consultation.
- Projects or system needs are identified with sufficient guidance on nature, location and timing.
- Regular publication to keep up with the required pace of the transition.

Policy Outcomes

- One clear, credible, long-term system plan, which key entities are aligned on, with an identified 'central' transition scenario to drive transmission investment and provide certainty to the market.

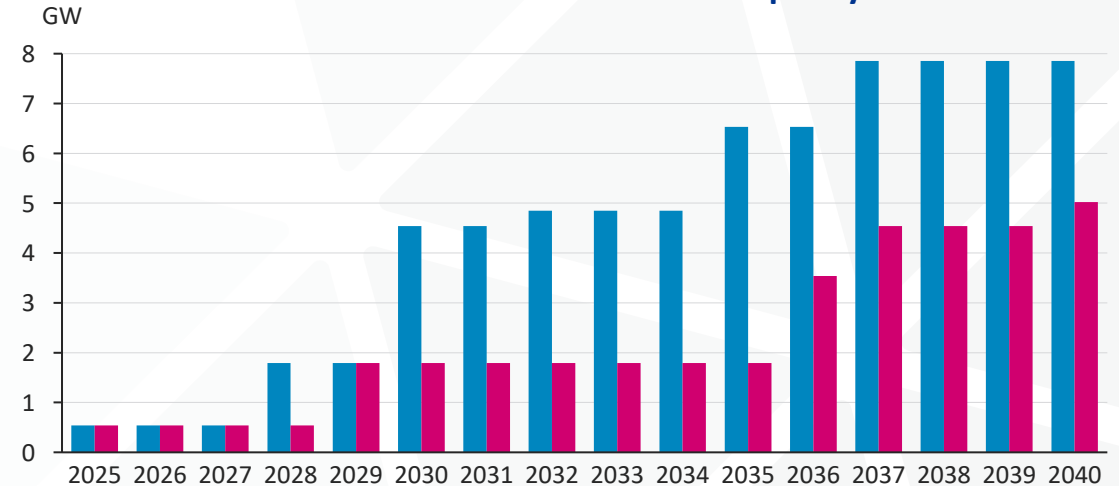


Currently, the WOSP was established as a central planning document to identify potential requirements for network augmentation over the coming 20 years

Commentary

- The Whole of System Plan (WOSP) is a study of the WEM over a 20-year horizon which models four different scenarios, varying significantly by level of operational demand (accounting for grid demand and distributed energy resources).
- The inaugural version of the WOSP was developed by the Energy Transformation Taskforce (established under the Minister for Energy) in coordination with AEMO, Western Power and industry.
- The WOSP identifies a number of augmentations required to facilitate renewable build out across transmission network zones and the flow of energy towards load centres. It does not consider within transmission zone transfer capacity, where network augmentations may also be required in the future.
 - While significant transmission projects were identified under *Double Bubble* and *Techtopia* scenarios, no additional build out is required under the *Cast Away* or *Groundhog day* scenarios
 - No priority projects were identified in this inaugural WOSP
- The WOSP does not identify a central, or most likely scenario. Instead, these are presented as potential scenarios, meaning **the range of potential new transmission capacity required by 2040 is between 0 GW and 8 GW.**
- The next WOSP report is due by September 2025 and is now under the remit of the Coordinator of Energy, responsible for overall system planning in the WEM.

WOSP 2020 new transmission capacity



Augmentation	Additional Capacity (MW)	Optimal Year of Operation	
		Double Bubble	Techtopia
EC-MT Phase 1	125	2025	2025
ME-SW Phase 1	250	2025	2025
SW-MT Phase 1A	1250	2028	2029
MN-NB Phase 1	1,750	2030	2036
NB-MW Phase 1	1,000	2030	2037
SE-SW Phase 1A+2A	180	2032	-
SE-SW Phase 1B+2B	130	2032	-
MW-NC Phase 1+2	480	2035	2040
NB-MW Phase 2	1200	2035	-
EG-ME Phase 1	290	2037	-
MN-NB Phase 2	1,200	2037	-

The SWIS Demand Assessment, Transmission Infrastructure Plan and Electricity Statement of Opportunities also introduce assessments of transmission requirements

The SWIS Demand Assessment

- On 9 May 2023 the State Government released the SWIS Demand Assessment (SWISDA) outlining a potential future transmission system in light of increasing industrial decarbonisation and electrification.
- The assessment focused on a 20-year horizon and highlighted the need for significant investment in transmission, renewable generation and storage.
- This process included significant consultation with stakeholders, predominantly large users, and used industry data to establish potential for demand growth in the SWIS.

The SWIS Transmission Infrastructure Plan

- This plan was developed by the Western Australian government as a roadmap in response to the results from the SWISDA to outline specific priority transmission infrastructure upgrades in the SWIS.
- The report provides minimal detail on options analysis and delivery timeframes for the augmentations.
- Notably, the modelling suggested that the Goldfields region would benefit from a regional, non-SWIS network, putting doubt on the initially proposed augmentations in the SWISDA that would reinforce connection to the region.

Electricity Statement of Opportunities

- AEMO is responsible for publishing an annual Electricity Statement of Opportunities (ESOO) for the Wholesale Electricity Market (WEM), providing a 10-year demand outlook.
- The ESOO identifies expected restrictions on transmission within sub regions and network investment opportunities to unlock new generation and storage capacity, noting that Western Power will assess and publish any need for augmentations.


Clean Energy Link Program

- This program of work is being progressed by Western Power, with the current focus on the Clean Energy Link – North project, consistent with the Transmission Infrastructure Plan.
- While some details are available regarding projects in CEL-North, there are minimal details of other proposed Clean Energy Link augmentations.






Currently, there is not a single, commonly accepted, system plan for the SWIS setting out a clear central transition pathway to guide transmission investment

Area	Objective	Assessment
 Long-term planning	Single, commonly accepted and regular report	<p>There are currently multiple, inconsistent, system and transmission planning reports published for the SWIS, which creates complexity and uncertainty. There is not currently a shared understanding of the central transition pathway the government, networks and market should be working towards.</p> <p>The WOSP, developed by the Coordinator of Energy, is broadly intended to provide the centralised system plan for the SWIS but does not provide a central view and is only published every five years. Since the inaugural WOSP report was published, two more reports (the SWISDA and the SWIS Transmission Infrastructure Plan) have been published by the government, neither of which is consistent with the WOSP. The ESOO, published annually by AEMO, also identifies potential transmission investments, and Western Power publishes its own annual Transmission System Plan providing important technical and planning information but without alignment to a central WOSP scenario (given the absence of such a scenario).</p> <p>The lack of a single, commonly accepted, report and central scenario creates uncertainty for stakeholders across the market and makes it challenging to ascertain how the transmission network can be expected to be built out to enable the transition.</p>
	Identification of system needs	<p>Given that the most prominent system plan, the WOSP, does not identify the central or most likely scenario within its modelling, there is not a clear central transition pathway with which to clearly identify system needs for the transition.</p> <p>While the various plans do identify potential system needs and transmission projects, these are inconsistent between reports and scenarios. The WOSP now formally has the function to identify priority projects, however the priority projects announced to date were put forward via a Ministerial Determination rather than through the plan. The forthcoming WOSP may include additional priority projects, however it is now unclear with which scenario these would be identified.</p>
	Robust and credible in the market	<p>The WOSP inputs, assumptions and scenarios were developed in coordination with a number of industry stakeholders including some industry participants, investors and advocacy groups. However, this process and the underlying data is not public and the work to establish the inputs is not subject to scrutiny from the wider market outside of the these stakeholders.</p> <p>The WOSP modelling outputs are explicitly ‘indicative’ which undermines credibility for it to be a guiding report on future transmission build out requirements.</p> <p>The inconsistencies between the various plans published for the SWIS risks undermining the credibility of all current planning as this brings into question the robustness of analysis, inputs and assumptions.</p>




Getting long-term system planning right is critical to efficiently progressing the energy transition in the SWIS, providing clear direction and investment signals [1]

Area	Objective	Proposed approach
 Long-term planning	Single, commonly accepted and regular report	<p>While a lot of considered planning work has been undertaken to date, the SWIS needs a single long-term system plan which identifies a central transition pathway and – critically – which key stakeholders can align on as the overarching system plan. The common acceptance and adoption of the plan, including across government, is important to ensuring all other planning and policy programs and publications are clear in their alignment with the plan and its central transition pathway, providing certainty to network businesses and the wider market.</p> <p>There are multiple parties which could hold responsibility for this plan:</p> <ul style="list-style-type: none">• AEMO: Given its role producing the WEM ESOO and its role developing the ISP in the NEM, AEMO is the preferred candidate for taking on this responsibility in the long-term. As per the ISP process in the NEM, the government would still be expected to play an important role in this system planning including by setting the targets and policies that AEMO would be required to assume in the model, and by developing the policy environment which gives AEMO’s plan standing and ensures it is actioned (see ‘Actioning the Plan’ in this Report). A key limitation of this option is that establishing this function will take time and might not be capable of fulfilling the near-term need for improved planning.• EPWA: Given EPWA already develops the WOSP, it could retain this responsibility with some enhancements to this process and plan. Enhancing the WOSP with a clearly identified and justified central scenario and transition pathway would make it a more actionable plan. Further, a more regular cadence of publication (more frequent than every five years) will enable the plan to keep up with market transformation.• Western Power: Recognising Western Power’s existing transmission planning responsibility, the scope of and process for developing the Transmission System Plan could be enhanced through formal requirements to enable this Plan to operate as the system plan. As for AEMO, if Western Power were formally given this responsibility the government would be expected to play a role in informing assumptions and embedding the report in the policy landscape. A transparent and consultative system-wide planning process with appropriate checks and balances would be needed to manage any conflict risk, and to ensure the government and other stakeholders could all have confidence aligning with the modelled scenario or identified central transition pathway. <p>Whichever option is taken, it is important that it is recognised across all key stakeholders as being the overarching planning report, and that a central transition pathway is identified.</p>



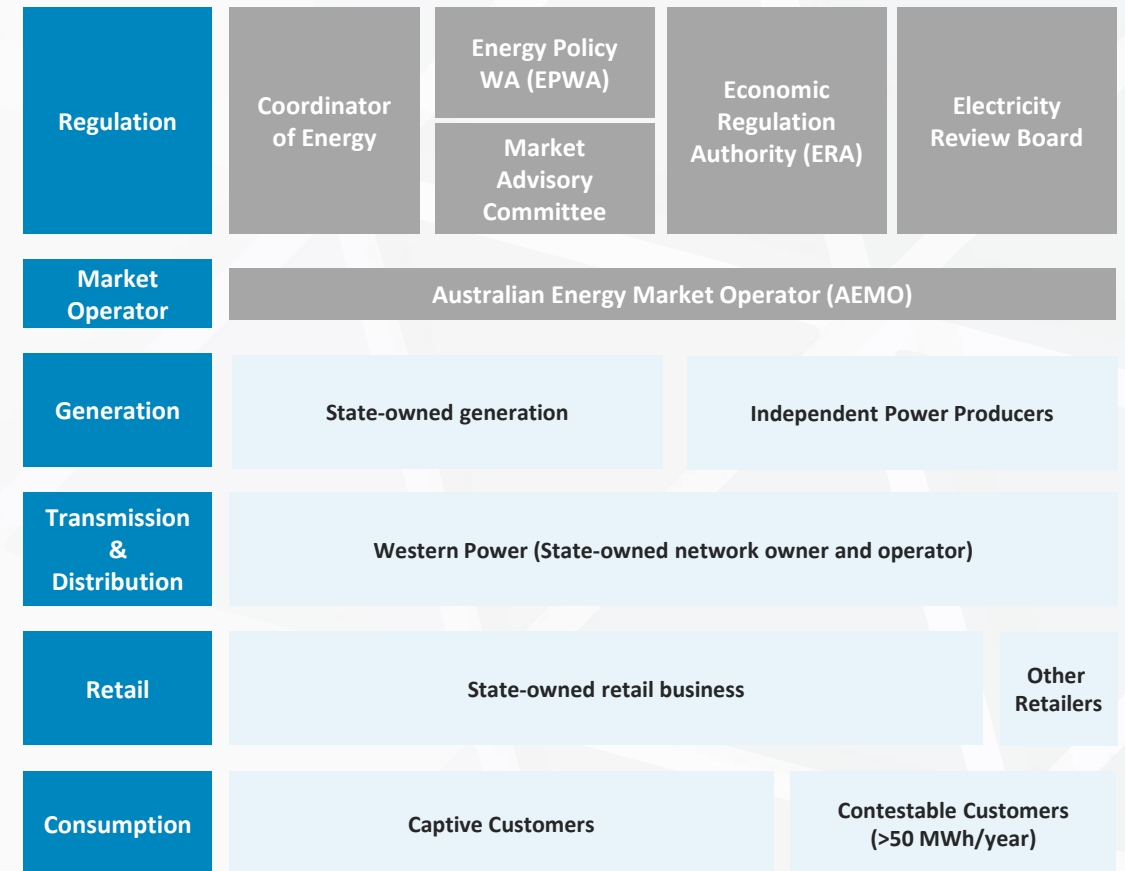
Getting long-term system planning right is critical to efficiently progressing the energy transition in the SWIS, providing clear direction and investment signals [2]

Area	Objective	Proposed approach
 Long-term planning	Identification of system needs	The existing planning and policy framework already creates an opportunity to identify priority projects. With a new or enhanced system plan for the SWIS which identifies a central scenario or central transition pathway, the priority or near-term projects should be consistent with delivering this pathway. The plan could either be used to identify specific projects – consistent with the NSW and VIC frameworks – or to identify a system need – consistent with the ISP in the NEM.
	Robust and credible in the market	Arriving at a single, commonly accepted, system plan with which other plans are consistent will likely bolster credibility of the planning framework, and the introduction of an independent planner could further support this credibility. Irrespective of who is responsible for the long-term plan, the process of developing this plan, and the inputs and assumptions, should be transparent and consulted on to ensure they are robust and to give stakeholders confidence in the process and plan.

Any reforms to planning or the enabling policy framework will need to balance optimal outcomes with timely implementation, to progress the near-term transition

- The planning and regulatory framework for transmission development in the SWIS requires near-term adjustments to facilitate a transition in line with the proposed coal closure schedule.
- While there may be merit in considering material redesign of SWIS governance in the longer-term, the experience of other states illustrates that this can take a number of years to implement. Further a current independent review into transmission planning in NSW has identified outstanding issues with the current frameworks in this state, many of which stem from the complexity of the new suite of entities and processes established. **A substantial restructure of governance arrangements in the SWIS, and potential introduction of new entities, would not be consistent with delivering a timely transition in the near-term.**
- As such, the analysis in this report has considered opportunities to leverage existing frameworks in the SWIS as much as possible, leaning into their strengths, clarifying roles and responsibilities, and adjusting as necessary to better enable delivery of the transition.
- Strengths of the existing SWIS frameworks include:
 - A number of major new transmission developments have been identified;
 - Recent introduction of a mechanism to enable development of ‘priority projects’ identified in the WOSP
 - Recent work to reform the connections process and prioritise the connection of ‘critical’ projects

Current governance and key participants in the SWIS

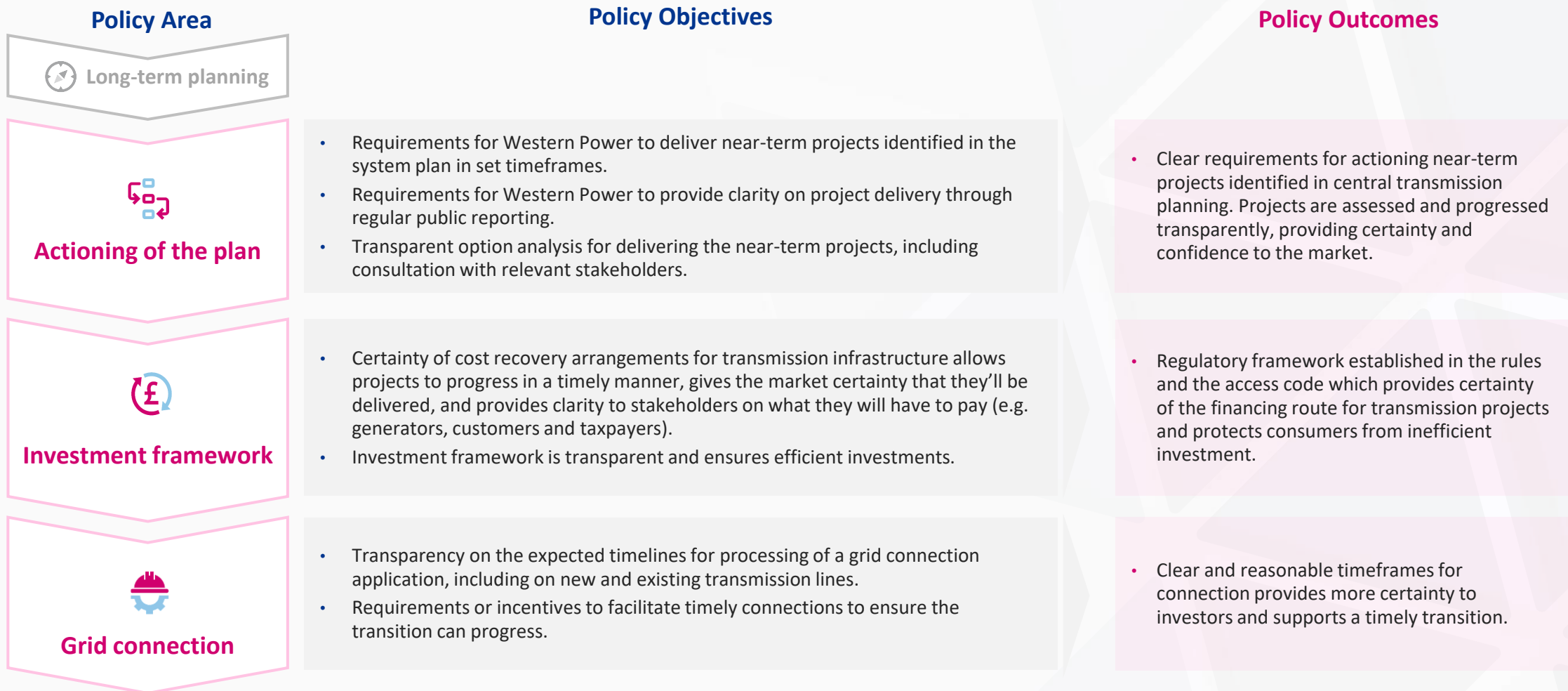


Supporting policy to enable the transition

With a suitable long-term system plan in place, there are a number of key supporting policy areas which need to be revisited to ensure they align with delivering the transition pathway identified in the plan.







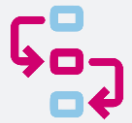
A well-defined planning and policy framework is essential to support the timely delivery of major new transmission projects in the SWIS and support the transition





On the East Coast, both NEM and state-level reforms have targeted the planning through to grid connection process to enable more timely energy transition.

Area	NEM	NSW	VIC
 Long-term planning	<ul style="list-style-type: none"> The Integrated System Plan, produced by AEMO as an independent planner, is accepted as the central whole of system plan. The ISP is published biennially, with a high degree of transparency of assumptions and industry engagement. AEMO has clear requirements for aligning with government policy and plans. 	<ul style="list-style-type: none"> The Network Infrastructure Strategy (NIS) is produced biennially by EnergyCo, a NSW Government entity. The NIS provides a state-level strategy for development of major new transmission projects, including proposed scale and timing. EnergyCo consults on a draft report but the inputs and assumptions are largely not published. 	<ul style="list-style-type: none"> The Victorian Transmission Plan is produced every four years by VicGrid, a Victorian Government entity. The VTP identifies REZs and priority transmission upgrades needed to deliver targeted generation and storage volumes as the system transitions. VicGrid consults on a draft report but the inputs and assumptions are largely not published.
 Actioning of the plan	<ul style="list-style-type: none"> The National Electricity Law and Rules have been reformed to embed the ISP in the regulatory process for transmission development. Once an ISP is published and near-term needs identified, transmission networks are required to commence work within a fixed time period. 	<ul style="list-style-type: none"> EnergyCo can consider options and recommend REZ projects which are then independently assessed by the Consumer Trustee which can recommend the project progresses. However, the NIS does not have statutory standing or formally play a role in network development. The Minister can also direct transmission networks to progress projects. 	<ul style="list-style-type: none"> VicGrid is responsible for coordinating the planning, procurement and development of transmission identified in the VTP optimal development path. The Minister can issue Orders for the development of transmission projects.
 Investment framework	<ul style="list-style-type: none"> Transmission projects responding to near-term needs identified in the ISP are typically consumer-funded. Options must be assessed through a regulatory investment test and the preferred option must demonstrate the maximum net benefit for consumers. The ISP feeds into this test and enables a fast-tracked assessment for near-term projects. 	<ul style="list-style-type: none"> Projects authorised under the NSW framework are subject to an abridged investment test to ensure efficiency, prudence and reasonableness. Revenue is recovered from consumers via distribution network charges. The NSW framework introduces contestability for some projects. 	<ul style="list-style-type: none"> The VTP development process subjects priority projects to a cost-benefit assessment, and this is not required again. Projects may be developed contestably, and the associated procurement process will ensure value for money and efficiency..
 Grid connection	<ul style="list-style-type: none"> Generators have clarity on the anticipated timelines for new network being available. Timelines for connections present a challenge for the transition but are currently faster than in the SWIS. 	<ul style="list-style-type: none"> For connection of projects into some Renewable Energy Zones, NSW has introduced access schemes which dictate which projects will connect. A batched connection assessment process has been introduced for these projects. 	<ul style="list-style-type: none"> For connection of projects into Renewable Energy Zones, VIC has introduced access schemes which dictate which projects will connect.



Actioning the plan

Policy analysis



Currently, there is a process for identifying Priority Projects but the policy framework does not ensure they are actioned in a timely manner

- In 2023, the WA government introduced the notion of ‘priority projects’ into the Electricity Networks Access Code in order to establish a fast-tracked route for progressing selected projects outside of the standard assessment and approvals framework.
- A priority project can be established either in the WOSP or under a determination published by the Minister.
- Once identified as a priority project, the project is exempt from being subject to a standard new facilities investment test and is not otherwise required to be assessed and receive approval under the access arrangements framework as other projects typically would before they can progress.
- While there is no direct obligation for any of the existing bodies to act to deliver a priority projects, Western Power is obliged to act in accordance with the Electricity Networks Access Code 2004 – planning and investing efficiently in the network considering the future system needs and must *consider* WOSP priority projects in the TSP.

WOSP identification

- The WOSP will consider two main criteria in determining a priority project:
 - **Urgency** – where a network limitation or technical constraint is expected to pose material risks to system stability or reliability within the next five years, and where there are potential barriers that may create uncertainty around the project’s ability to proceed
 - **Impact on electricity users** – Where the network limitation poses a significant barrier to the connection of major projects or constrains future growth and the integration of emerging technologies needed to deliver the lowest-cost energy to consumers.
- Priority projects were not identified under the inaugural WOSP in 2020.

Minister determination


- The Minister, when making a determination on a priority project, must publish the reasons alongside the determination showing alignment with the Access code objectives.
- The objectives of the code are to promote efficient investment and long-term consumer interests in relation to:
 - supply of electricity
 - the network; and
 - environmental consequences.
- The minister has determined two projects, Clean Energy Link – North and Regans Reinforcement, as priority projects.

- In terms of facilitating the delivery of identified Priority Projects, Infrastructure Western Australia has previously called for the establishment of a Government Facilitation Vehicle to help to coordinate the deployment of energy infrastructure investments in line with the timeframes required.¹

¹ Infrastructure Western Australia, Major Infrastructure Proposal Assessment Summary Report, North Region Energy Program 1,



While priority project status will enable near term planning to progress, there is no binding requirement to action projects in a timely and transparent manner

Area	Objective	Assessment	Proposed approach
 Actioning the plan	Requirement to deliver near term needs	Western Power is obliged to plan and deliver efficient investment to ensure reliability. While priority projects can be declared through the WOSP or by the Minister, to establish near term urgency and allow projects to be progressed, there is no direct regulatory link to deliver the projects in a timely manner. The TSP, which represents Western Power’s planned augmentations, is also required to consider the WOSP as one of numerous inputs but does not directly adopt and refine the options identified in the longer-term planning phase.	Introducing a clearer statutory link between projects identified in the long-term system plan for near-term delivery and requirements on Western Power to action these would provide certainty to Western Power and stakeholders across the market. This is important to ensuring the market stays on track with delivering on the identified system plan.
	Transparent option analysis	The process of developing and assessing project options, including network and non-network options, to address an identified need or fulfil an identified project need is not currently very transparent. The New Facilities Investment Test provides a requirement for publication of and consultation on the assessment of a preferred option, however priority projects are not subject to the same level of scrutiny and alternative options assessment. The SWISDA has been used as the options assessment for Energy Link – North.	A requirement to publish information about the options being considered to deliver a particular project or respond to a system need, rather than just on the final selected option, can provide certainty to stakeholders and improve the robustness of the assessment. If the SWISDA is intended to provide the options analysis for new projects, it must align with the central transition pathway in the system plan and the methodology and level of transparency must be suitable for this purpose.
	Clarity on delivery timeline	The WOSP provides a range of scenarios and identifies a year in which that scenario requires additional transmission capacity to be built, however the variance across scenarios means these timelines don’t translate to a delivery schedule. Western Power and the government have also announced proposed timelines for key projects being developed.	Public communication on anticipated timelines and ongoing progress against these timelines will help to build certainty and confidence amongst key stakeholders including prospective developers of new generation and storage. The development of a central long-term plan will help to support this objective.

We have not provided a ‘traffic light’ assessment of this policy area given successfully ‘actioning the plan’ is dependent on a strong performance against the prior policy area, ‘long-term plan’.





Investment framework

Policy analysis



Western Power typically receives funds for capital expenditure through the access arrangement framework

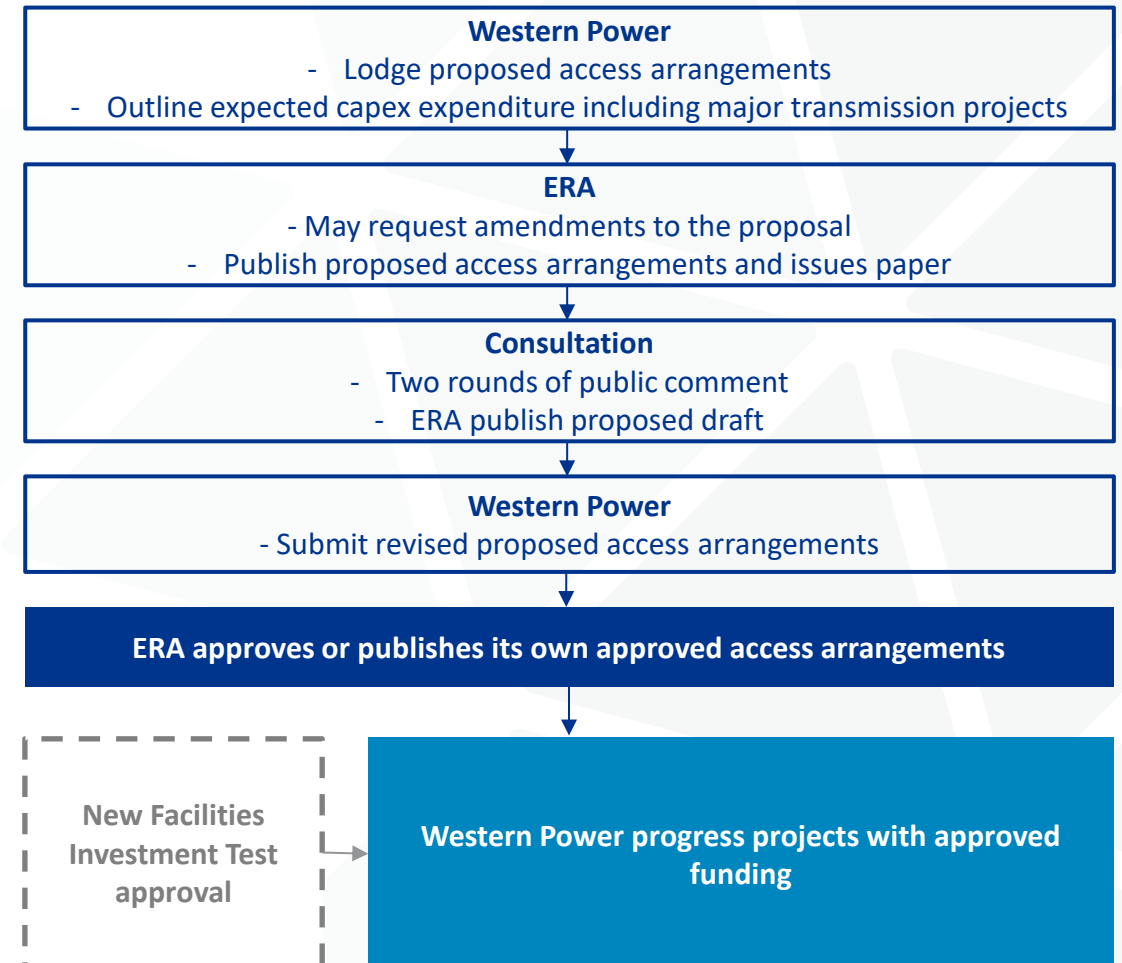
Access Arrangement Funding

- Under the Access Code, Western Power is regulated through fixed term access arrangements which are approved by the Economic Regulation Authority (ERA).
- The regulated process provides Western Power with funding with which it can finance major new transmission projects if they are included and approved in the Access Arrangements.
- This process must occur every five years, and the current access arrangement (AA5) expires on 1 July 2027.
- The AA5 period has been extended by 12 months in part to allow for learnings from the delivery of Clean Energy Link – North to be incorporated into the AA6, with the proposal acknowledging the challenge this will present.
- AA5 arrangements did not include planned works in relation to Clean Energy Link projects and so funding was not approved under this process in advance of Western Power initiating the works for Clean Energy Project – North.

New Facilities Investment Test (NFIT)

- Outside of Access arrangement approval processes, Western Power can apply for funding of projects, to be approved by the ERA
- Under the Access Code, a NFIT assesses whether proposed network investments are efficient and justifiable.
- An investment must either be recoverable through increased revenue, meet a simplified test, provide a net benefit, be necessary for safety or reliability, or qualify as a priority project.
- A determination from the ERA involves public consultation and a formal decision process.

Access Arrangements Approval Process





It is unclear how future transmission network expansion will be funded, especially for priority projects which have so far received significant direct government funding

Government Budgets

- Network projects that are identified as priority projects are not subject to parts of the 'regulatory test' framework under the code. They do require a Major Infrastructure Proposal Assessment to be carried out by Infrastructure Western Australia.
- The most progressed priority project to date, Clean Energy Link – North, has been funded directly through the WA Government Budget to date, alongside broader transmission planning works:
 - **2023-24 Budget** announced \$126 million for "Network planning and upgrades"
 - **2023-24 Mid-year Review** invested \$655 million for Clean energy Link – North and \$132.5 million for planning of other projects
 - **2024-2025 Budget** announced \$324 million for continued assessment of projects and long-lead time procurement
 - **2025-2026 Budget** announced a further \$584 million investment in Clean Energy Link – North (including Regans Ford terminal)
- The 2025-26 Budget Statements note that "These investments will be partly funded by internally generated funds, retained dividends, equity injection from Government and borrowings from the Western Australian Treasury Corporation."¹
- Government funding is ultimately recouped from taxpayers.

Regulatory Framework


- The 'standard' cost recovery pathway requires the ERA to approve capital expenditure for Western Power under the access arrangements framework.
- This expenditure would be recouped through electricity consumer tariffs, via retailers.
- Due to the uncertainty around future requirements and costs, the AA6 process was delayed.
- If a new investment is required during an approved access arrangements period, Western Power can submit a New Facilities Investment Test to the ERA for assessment and approval.
- Priority projects are subject to an abridged New Facilities Investment Test (however this has not yet been applied to the Clean Energy Link – North project or Regans Reinforcement).
- **The cost to consumers of major new transmission developments, vis-à-vis the costs recovered through other means, is unclear at this stage as Priority Projects and major network expansion have not yet been subject to a public investment test.**

Bespoke connection funding

- The State Government previously invited registration of interest (ROI) from substantial commercial and industrial entities, encompassing both generators and loads.
- The ROI was coordinated collaboratively by Energy Policy WA and Western Power.
- This process was to inform the timing and approach for future significant transmission projects, including potential locations for renewable energy hubs, with the goal of integrating more renewables into the grid.
- A core piece of this consultation was to understand the willingness of large energy users to contribute to major transmission system augmentations themselves.
- The proposal from government suggested allowing proponents to contribute \$100,000/MW towards funding new transmission projects to which they would connect alongside renewable generation and other loads.
- **With limited updates, there is significant uncertainty on whether an increased proportion of costs will be placed on large consumers and the viability of the proposal.**



Priority projects so far are funded by government, and delays to access arrangements as well as open consultations are resulting in significant uncertainty on costs

Area	Objective	Assessment	Recommendation
 Investment framework	Certainty of cost recovery	<p>The costs associated with delivering the large transmission projects required for the transition could be recovered from consumers, generators, and/or taxpayers. There is currently uncertainty around the extent to which costs will be recovered through each of these routes going forward. This uncertainty risks delaying the progress of network projects while Western Power awaits allocation of funding or cost recovery approvals, and creates significant uncertainty for stakeholders.</p> <p>AA6 delays have introduced uncertainty on the financing of projects other than the Clean Energy Link - North, with little public detail available of Western Power's progress on these projects.</p>	<p>Certainty of the ongoing cost recovery approach for new transmission investments required for the energy transition is important to ensuring that revenue certainty isn't cause for delays and to providing certainty to stakeholders that the projects will progress. Further, providing developers and investors with certainty of the anticipated recovery of costs from connecting projects (ie. how much they will have to pay) will be important to reducing risk for these prospective projects and encouraging investment.</p>
	Efficient investment	<p>The Clean Energy Link – North project, which was both the first major transmission development to facilitate the energy transition and the first Priority Project, is in progress with contracts having been awarded for design and construction of some project components. It has not been subject to a public investment test to demonstrate that the proposed infrastructure is an efficient investment to meet the system needs. Instead, the SWISDA has been used as the means to test options and demonstrate efficiency. The business case submitted to government for the Project drew on the SWISDA to justify the efficiency of the project.</p> <p>Until an investment test is undertaken and published for this or Regans Reinforcement, it will not be clear whether the existing New Facilities Investment Test is fit-for-purpose for major Priority Projects.</p>	<p>The approach to assessing the efficiency and prudence of new investments, such as the <i>New Facilities Investment Test</i>, should be reviewed to ensure it is fit-for-purpose to enable efficient investments in the context of large and anticipatory transmission development.</p> <p>With the introduction of a commonly accepted long-term plan, any benefits assessment applied through an investment test should be aligned with the anticipated generation and storage development assumed to be unlocked by delivery of the project in the central scenario of that plan. If the SWISDA continues to be used to demonstrate efficiency, it should be aligned with the central transition pathway in the system plan and afforded a high degree of transparency.</p>

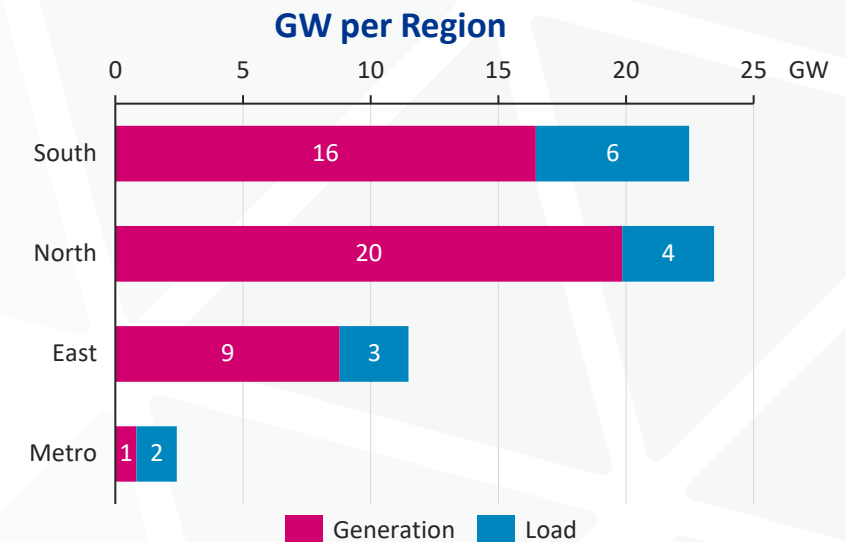
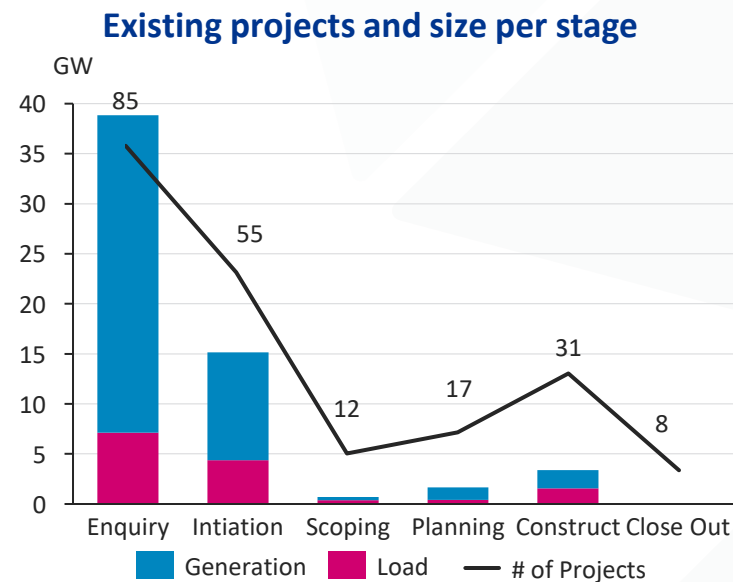
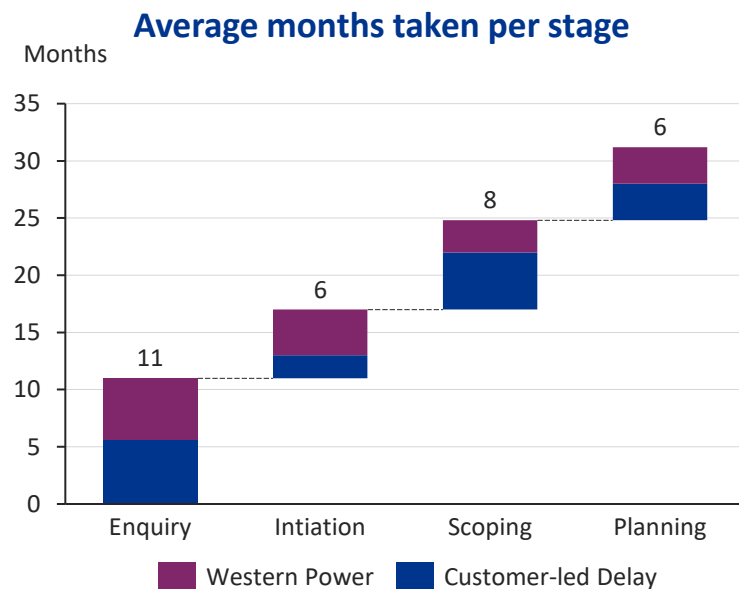


Grid connection

Policy analysis

The long timeframes from grid connection process in the SWIS are likely to pose significant risks to enabling the transition unless markedly reduced

- Due to significant growth in enquiries over the last 3 years, especially for generation and battery storage projects, large queues have developed for Western Power to process each project.
- This may pose significant delay risk new projects – the average timeframe for the connection process from connection enquiry to reaching construction and commissioning stage is **31 months**. This includes time taken at each stage by both Western Power and the customer submitting the application.
- The enquiry stage on average takes the longest to progress as Western Power spends significant time assessing projects in this phase before enabling a project to move to the connection application stage. This stage is also where the largest volume of projects sits given it is the first step to filter out whether projects can go ahead or not.
- The North region has the largest (by MW) amount of grid connection applications currently being processed.





Recent reforms have aimed to streamline the connection process for new generation and increase transparency

AA5 Reforms to the grid connection process

- Western Power's current access arrangement period was one of considerable uncertainty, due to the potential for significant demand growth and expansion of the transmission network.
- The requirements in ERA's final decision aimed to ensure that Western Power optimised its operational processes and resources, however, the ERA highlighted that **broader changes to the regulatory framework would be required to deal with the scale of connections expected as the SWIS transitions**.
- The ERA's final decision required improvements to Western Power's application and queueing process through a number of policies:

Quarterly publication of queue statistics

- WP must provide data for each major category of connection type, including:
 - average length of time spent at each stage in the connection process
 - comparison to the previous period



- Western Power now publishes a Quarterly Customer Insights Report

Increased insight and scrutiny of project timelines

- WP must provide connection applicants with a schedule of expected dates for each stage in the connection process
- Any delays must be explained to the proponent and the ERA



- Western Power is now subject to an annual progress report with detailed timeline data and assessment of delivered improvements and plans

Connection Enquiries

- This stage was to be made optional, to give proponents the option to submit connection applications immediately
- This stage was also to be "streamlined"



- Western Power has outlined a new transparent system and critical project criteria
- New streamlined process and form will be implemented in Q3 2025, but the enquiry stage is still mandatory

Increased clarity and transparency on process requirements

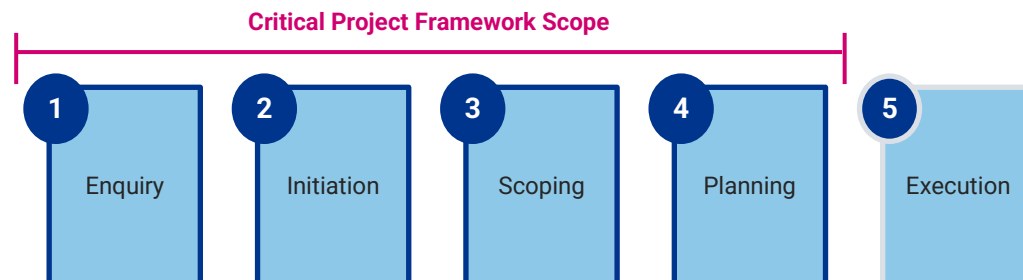
- WP must:
 - publish a default process and study requirements
 - publish a list of approved third-party consultants to undertake studies
 - Allow access to models and data



The new critical project assessment process could improve connection timeframes for some important projects, but only to existing transmission lines

Critical Project Framework


- Western Power historically adopted a first-in, first-served approach to progressing applications in the grid connection process.
- A new assessment of projects during the connection process aims to ensure “critical” projects are progressed sufficiently quickly ahead of not critical projects.
- All “major customer projects” will be assessed, which includes:
 - Generation >10MVA
 - All transmission level load
 - Any overlapping distribution projects
- The assessment will account for how strategically important a project is, its system impacts and the probability of delivery.
- Critical projects are given “right of way” during the relevant steps of the grid connection process and are allocated additional resources from Western Power, but there is **no cap** on the number of critical projects which can be identified.
- In the context of new transmission infrastructure, connection applications can only be assessed **after** a line is built, even if a project is to be deemed “critical”.



Criteria	Considerations
Project's expected impact network stability, reliability and system security	<ul style="list-style-type: none"> Asset size, location, type and required in service date Existing Network Other projects in progress
Project's alignment to Western Power and external stakeholder policies	<ul style="list-style-type: none"> Asset size, location, type and date Alignment with state policy Alignment with stakeholders e.g. government bodies
Project's alignment to external stakeholder directives and direction	<ul style="list-style-type: none"> Asset size, location, type and required in service date Alignment with frameworks
Customer readiness	<ul style="list-style-type: none"> Organisational Financial Technical
Customer ability	<ul style="list-style-type: none"> Land Access Social Performance Relevant experience
Connection ability	<ul style="list-style-type: none"> Standards alignment Complexity Reliance on current vs. future network



Despite recent reforms, timelines for connection are still a significant risk to the transition and the process is not fit-for-purpose to manage connection to new lines

Area	Objective	Assessment	Preferred approach
 Grid connection	Transparent and clear process	<p>Recent reform has focused on improving transparency for grid applicants through process streamlining for ‘critical’ projects and reporting requirements. This critical project framework is a step in the right direction however there is still uncertainty in the market around the transparency of decisions and how critical status will apply. Importantly, it is not currently intended to extend to managing the connection of projects to new lines.</p> <p>There is not currently a fit-for-purpose arrangement for managing and progressing connections to new lines to enable efficient connection of projects soon after this new network capacity is unlocked.</p>	<p>The critical project framework for managing connections could be further refined to provide more clarity on how it will be applied and which projects could be identified as critical. More clarity could increase investor confidence. Adjustments to this mechanism or the introduction of a complementary mechanism should be considered to manage the connection process for projects seeking to connect to new transmission lines. This is important to ensuring there is a pipeline of approved projects developed in parallel with the network infrastructure and ready to connect when the new line is up and running. This would ensure the new network infrastructure is delivering benefits as soon as possible and is important to facilitating a timely transition to renewable energy.</p>
	Reasonable expected timelines	<p>Current timeframes for a connection application to be progressed to planning are almost three years. This is comparatively long for Australian connection timeframes and could add significant delays to connecting generation and load to the SWIS. It is likely that this will place pressure on a successful energy transition.</p>	<p>Timelines for progressing from enquiry to execution need to be reduced in order to progress the transition. This may involve greater scrutiny on customer led delays and increased resourcing for Western Power. It is important to note that despite AA5 grid connection process improvements, the ERA has highlighted the limitations of the grid connection process to address the scale of the transition without broader regulatory and planning framework improvements.</p>



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