

NSW TRANSMISSION PLANNING REVIEW - OPTION PAPER

16 MAY 2025

INTRODUCTION

The Energy Users' Association of Australia (EUAA) is the peak body representing Australian commercial and industrial energy users. Our membership covers a broad cross section of the Australian economy including significant retail, manufacturing, building materials and food processing industries. Combined our members employ over 1 million Australians, pay billions in energy bills every year and in many cases are exposed to the fluctuations and challenges of international trade.

Thank you for the opportunity to make a submission under the NSW Transmission Planning Review - Option Paper.

The transition to a low carbon energy system is proving to be exponentially more challenging than was first anticipated, even more so in NSW as the Roadmap seeks to accelerate the largest transformation in the NEM. From our experience, the planning and coordination of multiple entities involved in the transition is difficult to engage with. Many stakeholders find it confusing to understand which entity is responsible and therefore accountable for each of the required tasks. Based on our extensive experience, the planning and coordination aspect of the roadmap is well below what we would consider to be best practice. As such, the NSW transition is costing more than it should with near zero transparency for consumers on the potential impacts on their electricity bills, creating an unknown tsunami of future network related costs that consumers are ill-prepared for.

Part of the problem is NSW's focus on being a significant net exporter of renewable energy as opposed to ensuring there is sufficient volumes of energy to meet the needs of NSW consumers with an ability to export an efficient number of electrons, recognising that other jurisdictions are embarking on their own decarbonisation journey and seeking a high degree of energy independence. The approach to date in NSW focusses on maximising the number of renewable energy installations and therefore tends to prioritise renewable developers over consumers. We fear this will lead to a significant overbuild of assets in NSW, adding additional costs to NSW energy users.

This approach is exacerbated by a general lack of forward-facing planning in the NEM. Forward-facing planning is where planners would start from a vision of a 2050 electricity network and work backwards to what is required today to meet demand and system security, rather than the current approach that models what is needed at the next target date, being 2030.

In addition, many of the current players in NSW's transmission planning tend to operate outside of the traditional regulatory frameworks meaning there is little to zero transparency. This lack of transparency and accountability makes it very difficult for consumers to understand the benefits from the proposed projects, causing dissent on being forced to pay for these projects with publicly untested assumptions and budgets.

All of this means that NSW's current approach is haphazard, expensive and an apparent priority to make renewable energy development announcements, again, driven by the needs of developers and not consumers with no transparency.

We are also concerned that the NSW transmission plan appears to be operating in a planning silo where the opportunities that exist in the distribution system are given little consideration. We see a significant role for Distribution Network Service Providers (DNSPs) in the transition, including hosting capacity for renewable energy, storage and system security, much of which does not appear to be included in transmission planning documents. We believe that utilising existing capacity within distribution networks will result in less investment required in transmission networks, ultimately leading to a cheaper transition for consumers.

It is for these reasons that a full, state-wide electricity network assessment must be part of a revised centralised planning function to achieve the most efficient mix of new and re-purposed/better utilised assets.

We also see a need for demand side projections to be utilised in transition planning, including in NSW Transmission Planning. While roof-top solar is already having a large impact on the transmission network, missing is the impact of electrification of both residential and industrial consumers.

This lack of coordination is also having a direct impact on electrification opportunities. We have had feedback from member companies that electrification (in the order of GWs) cannot occur until the transmission network upgrades are approved, which is preventing our members from receiving financial investment decision from their board(s). However, in many cases transmission upgrades are difficult to justify in the absence of a firm commitment from new load. We appreciate the difficult situation each party is faced with as both are acting rationally and in the case of networks, within the boundaries of regulation. This is where having a government owned entity, such as EnergyCo, who coordinates the planning and delivery of such projects, working in tandem with various government funding bodies, can have significant influence, ensuring that required energy infrastructure is built while supporting large manufacturing plants maintaining jobs in Australia.

This approach would be consistent with EUAA advocacy over the last few years where we believe that governments will need to take a far more active role in the transition, especially during the “messy middle” phase we are in, to ensure consumer costs are managed and electrification/decarbonisation occurs. Initially this approach was focussed on the financing of large transmission projects but there may also be opportunities to reduce costs through efficiency gains and coordinated planning of new electrical infrastructure.

At the EUAA we support the design of rules, legislation and procedures that achieve efficient, cost effective and equitable outcomes for networks, developers and consumers. In the energy sector under most circumstances, this is best achieved through a national approach and a sharp focus on the NEO. The current NSW Transmission Planning regime does not meet these fundamental tests.

In summary, our option preferences are as follows:

- **Support Option A.3** – EnergyCo takes on all planning functions under the EII Act in a structured transition – many benefits including facilitating greater consumer involvement – see Governance below.
- **Support Option A.4** – the Options Paper provides no evidence to support the assumption in the EII Act that contestability adds value for consumers – in the absence of this evidence our assumption is that it is not going to be changed therefore we support Option A.4 with EnergyCo consulting on contestability criteria.
- **Support Option A.5** to introduce a lot more prescription to the connections process and remove Transgrid’s ability to exercise any monopoly power in connection to its network
- **Support Option B.3** – consistent with EnergyCo planning role – much simpler and more co-ordinated

- **Support Option C.1** – development of a transparent decision-making process that provides greater certainty as to whether a project proceeds under the EII Act or the NER
- **Support Options C.2 to C.5** – which provide for greater collaboration and joint planning between EnergyCo, AEMO and between other planning bodies across jurisdictions (VicGrid, ACT Government, and Powerlink).
- **Support Option D.1** – EnergyCo is the system strength and inertia provider
- **Support Options D.2 to D.5** – to amend the NER to clarify and extend the SSSP function to contestable networks
- **Support Options D.6 to D.10** – That distribution networks are considered in planning the energy transition
- **Support Options E.1 to E.7** – to improve consultation
- **Support Option E.11** – EnergyCo to publish and consult on its budget
- **Support Option E.13** – separation of DCCEW and EnergyCo

Problem Definition

We agree with Farrier Swier’s problem definition in the Options Paper. Specifically:

- Consumers keep being told the Roadmap infrastructure is necessary and will bring lower prices but all they see are increasing prices. This is a significant trust issue for consumers. Over the last few years they have seen the narrative start with ‘prices will fall’ then morph into ‘prices will be lower than the alternative’ which has now morphed into something like ‘prices will increase but they will be lower than the alternative in the long run’. At this point in time there is no indication of how high cost will go or for how long before they start to fall.
- There is very little transparency around the Roadmap – we just have to trust all the players given they are supposed to be dedicated to ‘the long-term financial interests of NSW consumers’. However, it is not clear what that means nor has there been substantive consumer engagement that seeks to align policy with their preferences.
- The lack of a clear framework in the EII Act for effective engagement with consumers mean consumers are largely excluded from having any influence – we are just expected to pay the bills for something we are told is great for us.
- The Government’s Roadmap Consumer Reference Group (CRG) is mostly an ‘inform’ body where it appears the government is simply ticking a box on consultation. Members of this group are required to sign a confidentiality deed to be able to participate in meetings; this means when there is a discussion about different Roadmap recovery methodologies, CRG members are prevented from engaging with their members or the DNSPs to provide an opinion.
- There are no opportunities for substantive consumer involvement in any of the work undertaken by EnergyCo or AEMO Services; public reports produced by these bodies are high level summaries that hide behind the cloak of confidentiality while there is no public submissions process to engage with a broader group of stakeholders.
- We fully agree with the key issue being the complexity of the regulatory arrangements with at least 7 different bodies being involved in transmission planning – any wonder the Roadmap [administration costs line](#) are so high:

2022-23	2023-24	2024-25	2025-26	2026-27
\$19.57m	\$30.67m	\$66.91mm	\$84.01m	\$78.01m

- We have engaged with several NSW roadmap projects e.g. the Hunter REZ where we have had first-hand experience of this complexity and trying to understand who does what between EnergyCo, AEMO Service, the Consumer Trustee, the AER and Ausgrid:
 - For example there have been three cost benefit analyses (CBA) for the Hunter REZ; AEMO Services in the [2023 IIO Report](#), [EnergyCo modelling](#) in its role as the Infrastructure Planner for its recommendation in April 2025 to AEMO Services to authorise the Hunter REZ and AEMO Services performed another CBA (because the one it did in the 2023 IIO Report was out of date) for its [authorisation decision](#) in May 2025.
 - Only high-level summaries of these CBAs were published with little transparency.
 - Ausgrid's proposed capex includes a \$92.9m Infrastructure Planner Fee with no transparency of what it covers and no independent assessment of its prudence and efficiency, i.e. the AER cannot review it.
- We agree with the Option Paper's description that contestability may seem attractive, but it could dramatically increase complexity. We also have concerns that there are no clear principles to decide which projects should be contestable; the absence of which makes it difficult to form an objective opinion.
- We agree that Transgrid has a large conflict of interest as the planner, a competitor in contestable projects and is also the party REZ developers are connecting to; if it wants to be a participant in the Roadmap and expand its network then it should not have a lead planning role (recognising that some functions may need to be retained by Transgrid while others will transfer over time). Why has this become an issue? In the past where large-scale augmentation and REZ's were not contemplated, having the local TNSP as the system planner made sense. We are in a vastly different situation due to the transition to renewables which is adding cost, complexity and potential conflicts of interest that were not significant issues in the past. We believe these changed circumstances should give rise to a review of the TNSP's roles and responsibilities.
- Under the Roadmap, deals to build each project are done without any consumer involvement e.g. the Adjustment Events in each Commitment/Project Deed are key to costs the project developers will pass on to consumers.
- The role of the AER is constrained by the legislation requiring them to calculate the 'prudent, efficient and reasonable' capital costs with no clear understanding of reasonable; so far 'reasonable' has been interpreted as 'the best cost estimate that can be developed by the proponent in the short time available', whereas the AER is looking for [AACE Class 2 estimates from Marinus](#) under the National Electricity Rules (NER).
- The original Roadmap legislation on Maximum Capital Cost as a real cap on capex but has been removed. When this combined with the scope of Adjustment Events means consumers are very exposed to cost increases; when we see the summary CBAs that are published they always show net benefits no matter the costs, but we have no way of testing the models and in any case the fact that the costs are certain and benefits uncertain seems to be ignored. This approach fails the assessment criteria 3 – allocate risks efficiently between investors, electricity consumers and government because consumers have no visibility on how that allocation is done
- Lack of proper consideration of role of distribution network – a lot of spare capacity that can be developed quicker and at a lower cost than ISP projects has been ignored in the past by the ISP – now the NSW DNSPs are doing their own NSW ISP

Infrastructure Planners Fee

So far we only have CWO REZ to understand the Infrastructure Planner Fees. These fees cover – see pp 26-7 [here](#):

- Construction Fees – paid to EnergyCo during the delivery phase of the project for development and delivery activities undertaken or planned to be undertaken by EnergyCo prior to Financial Close or during the delivery phase (\$747m)
- Operating and Maintenance (O&M) Fees – paid to EnergyCo for functions to be performed by EnergyCo during the operations phase of the project (\$1,293m)
- Recovered fees – payments for agreed early works activities by ACERZ (\$726.5m)

Under the EII Act, the AER is not required to assess the ‘prudence, efficiency and reasonableness’ of this \$2.767b. We understand that these costs were signed off by the EnergyCo CEO. Further, the total CWO capex costs were redacted from documents so we have no idea of what level of capex the AER was assessing.

Having zero consumer engagement on this \$2.67b and a less than adequate independent assessment of cost, it is difficult to advise our members with any confidence that consumers are now expected to accept this cost as part of their ongoing bills.

Cost Recovery

Cost recovery arrangements are not within the scope of the Review, but the Options Paper notes the Justice and Equity Centre (JEC) submission on this matter (p. 29) where the Options Paper says:

“While changes to cost recovery arrangements are not within the scope of this review, these differences inform the problem definition and the need for clear tests or principles to determine which projects should be planned under each framework given the significant impact that decision can have on some customers. We are also mindful of the inefficient and inequitable outcomes that can arise from the current cost recovery arrangements due to the disproportionate share of the costs that are recovered from small customers and the impact this can have on social licence for the entire Roadmap and energy transition as noted in the Justice and Equity Centre’s submission.”

In our view JEC’s proposed cost recovery approach, which we understand to be similar in approach to every user pays the same c/kWh roadmap charge, appears to be inefficient and inequitable.

We believe the JEC approach would result in:

- significant increases in the Roadmap charges to larger users; and
- disproportionate increases in the Roadmap charges to those residential consumers who cannot benefit from roof top solar who will also effectively provide a cross subsidy to those who do.

We are concerned that a c/kWh Roadmap charge will result in loss of social licence from these users for the Roadmap and the transition.

As an alternative, we recommend that an equal percentage increase in the electricity bill for all NSW consumers (including those who are transmission connected) is a far more efficient and equitable method of cost recovery.

Where cost recovery methodology may be in scope for the Review is how the assignment of planning roles has an impact on the cost recovery method. For example, taking a role out of the NER cost recovery and placing it into Roadmap cost recovery. We would recommend that the review discuss the cost recovery implications of their recommendations.

Theme A: Allocation of roles and responsibilities

While AEMO has the role of producing the Integrated System Plan (ISP), the role of implementing the proposed actionable projects is performed by each jurisdiction and the jurisdictional rules and regulations that apply. Some of these roles precede the ISP and the energy transition, i.e. business as usual planning created from organic load growth and connecting new renewable energy facilities, while other roles have only recently been created, including strategic long term planning of transmission networks to cater for an abundance of distributed variable renewable energy generation and storage, and issues that have developed due to synchronous generation retirement and inverter based generation now dominating generation such as system security and other system services.

In response to these issues, the NSW Government has created the most confusing and overly complicated jurisdictional processes in the NEM. With many players making decisions - NSW DCCEEW, EnergyCo, AEMO Services Limited (ASL), Transgrid, AEMO and the AER all having roles under the many different processes in proceeding with projects. These processes include:

- actionable ISP projects,
- business as usual network projects and/or system security projects under the NER,
- as a REZ Network Infrastructure Project (RNIP) or a Priority Transmission Infrastructure Project (PTIP) under the EII Act.

To add to the confusion, the same players listed above play different roles under the various processes, resulting in significant issues with transparency (described with examples above) and the potential to “game” the system to achieve an outcome that is expressed as beneficial to consumers, without consultation with consumers or appropriate, independent assessment by the AER.

To compare to other jurisdictions:

- Queensland has a much more simplified approach with one entity (Powerlink) having the primary role (along with the QLD Government and Energy Queensland - EQ) performing the roles of network planner (for business as usual and long term), system security and REZ planning and development. Both Powerlink and EQ are in a unique position of being government owned corporations with the costs recovered in a NER framework and transparency through various public reports and customer panels.
- Victoria has AusNet Services performing the BAU operational planning and AEMO Victoria Planning (AVP) performing planning tasks. The blurred responsibilities between AVP and AEMO, and the blurred consultation responsibilities between AVP and AusNet led to long delays on Western Renewable Link. However, with AVP, its delivery arm Transmission Company Victoria and the government owned VicGrid soon to be amalgamated, Victoria will have one entity performing all strategic tasks. This separation in Victoria between public interests and private interests is driving a higher level of consultation and transparency than under the previous regime, and much higher than NSW.

It is clear from the actions and outcomes of Queensland and Victoria (and more recently South Australia) that Governments need to have a decisive yet arms-length role in the strategic planning of transmission networks for an efficient, effective and transparent transition. NSW has the organisational structure in place, but needs to implement a clear separation with clear roles and responsibilities.

In NSW, we believe that an independent planner is required to ensure separation of public and private interests. However, in achieving the endgame of a structure that looks more like Victoria (Option A.3), we believe that a transition plan that may step through Option A.2 needs to be set in place that allows for the transfer of responsibilities and doesn't adversely impact the investments made by each of the organisations.

In particular,

- we believe that ASL needs to be either merged into EnergyCo, or ASL takes on a consulting role, rather than its current role to ensure that it is acting in the best interests of consumers.
- Additionally, we believe DCCEEW needs to take a step back from the operations of EnergyCo, and, as with Victoria and Queensland, only develop the overarching policy and legislation that enables EnergyCo to independently deliver the EII Act.
- In transitioning to a new regime, the roles and responsibilities needs to be articulated in a way that does not cause confusion.

We also support the inclusion of strategic distribution planning.

In summary, we:

- **Support Option A.3** – EnergyCo takes on all planning functions under the EII Act in a structured transition with many benefits including facilitating greater consumer involvement – see Governance below.
- **Support Option A.4** – the Options Paper provides no evidence to support the assumption in the EII Act that contestability adds value for consumers – in the absence of this evidence our assumption is that it is not going to be changed therefore we support Option A.4 with EnergyCo consulting on contestability criteria.
- **Support Option A.5** to introduce a lot more prescription to the connections process and remove Transgrid's ability to exercise any monopoly power in connection to its network

Theme B: Planning reports

As with the roles and responsibilities, there are currently many different reports outlining the "Plan" for NSW, often with significant overlaps and contradictions leading to further difficulty in understanding the true benefits and costs of the entire transition.

As such, we support the development of a single overarching planning report for NSW (Option B.3), supported by joint planning processes between EnergyCo, AEMO, TNSPs and DNSPs. In shifting to an overarching report, a consistent modelling approach needs to be agreed and a recognition of the growth of CER and bi-directional flows in the distribution networks needs to be incorporated.

- **We Support Option B.3** – consistent with EnergyCo planning role – much simpler and more co-ordinated

Theme C: Interactions between NSW and national frameworks

While everyone supports more integrated planning across jurisdictions, it is constrained by State policy. Even if it is cheaper to generate electrons in one State and send them to another. From our observations, State policy effectively limits the transfer of significant quantities of electrons because it focusses on State development and “home grown” energy security rather than seeking the lowest electricity costs. As stated in the Introduction, this approach has created barriers to NSW’s transition and challenges the assumption that the more renewable energy we build in NSW the more we will be able to export to other jurisdictions.

With multiple pathways available for projects to proceed in NSW, we support the development of a transparent decision-making process that provides greater certainty as to whether a project proceeds under the EII Act or the NER (Option C.1). We also support Options C.2 through to C.5 which provide for greater collaboration and joint planning between EnergyCo, AEMO and between other planning bodies across jurisdictions (VicGrid, ACT Government, and Powerlink).

Theme D: Planning for System Security Services, Distribution Networks and the Needs of the Customer.

We note that under the NSW framework, system strength is planned and procured by Transgrid under the NER, or by the Infrastructure Planner for EII Act projects.

We also note a recent AEMC rule change to the system strength framework that requires large loads and generation connections to assess the system strength impacts of their connection and that the proponent can self-remediate or pay a system strength charge to the system strength service provider (SSSP).

This is another example of inefficient practices as a result of the NSW EII Act that creates confusion, complexity and in the case of CWO REZ, a lack of transparency (i.e. the increase in roadmap charges from ACEREZ provided system strength).

We therefore support EnergyCo becoming the SSSP and inertia provider in NSW (Option D.1). We also support Options D.2 to D.5 which aim to amend the NER to clarify and extend this function to contestable networks.

We also consider that the NSW regime does not support distribution solutions to be easily brought forward for EII Act projects and while the 2026 ISP is to take more account of integrating DNSPs, it is too little, too late. The selection of Ausgrid to provide a sub-transmission solution for Hunter REZ is a good outcome but it came despite the regulatory framework, not because of it. We often question if anybody has REZ options to utilise the large spare capacity in the Essential Energy network (we understand this to be a network wide utilisation factor of 18%) and what utilisation of this spare capacity might save NSW consumers?

Given the current lack of proactive utilisation of distribution networks in planning the energy transition, we support Options D.6 to D.10 which expand the scope of planning reports, modelling capabilities, joint planning, and PTIP and REZ Infrastructure Plan (RNIP) tests to consider distribution and CER level opportunities and constraints. From this perspective, we support an independent and well governed process that considers and coordinates system strength across all transmission, sub-transmission and distribution networks.

There is also a need for a more coordinated Government approach to decarbonisation across NSW. The size, complexity and pace of the decarbonisation challenge is unprecedented and in many cases it is beyond the financial, physical and technical capabilities of participants to achieve within desired timeframes and cost outcomes. All of this represents risk for participants that is difficult to assess and will in most cases result in a more expensive transition. It is for these reasons that we believe governments must play a more active role to help manage these risks and costs, at least for a period of time until risks are better understood and able to be managed more efficiently.

For example, amongst our members, electrification is one option for decarbonisation, but requires significant increases in transmission network capacity (GWs) in order to proceed. We have observed that many of these large consumers are unable to proceed with electrification projects without a commitment for the transmission network upgrade to proceed. While not in scope of this review, the costs associated with these network upgrades can also be significant and act as a “dead weight” in the business case for electrification.

At the very least, EnergyCo could help bridge the commitment gap between networks and customers to enable industry to better plan its decarbonisation.

In summary, we:

- **Support Option D.1** – EnergyCo is the system strength and inertia provider
- **Support Options D.2 to D.5** – to amend the NER
- **Support Options D.6 to D.10** – That distribution networks are considered in planning the energy transition

Theme E: Engagement and Governance

Due to the lack of genuine consultation and transparency, it is extremely difficult for consumers to provide a deep insight into the inner workings of the various groups identified. If we are unable to see how the sausages are being made how can we vouch for the quality of their contents and benefits to society?

We note that all distribution and transmission businesses have obligations under the NER to genuinely consult with consumers and other Stakeholders. We see no reason why each and every organisation participating in the NSW Transmission Planning should not also have to follow the NER rules for genuine consultation.

Options to improve engagement with consumers

- EnergyCo having all the planning functions makes it organisationally simpler to develop effective consumer engagement - we are not engaging with different organisations with different functions and it is clear where our influence lies
- We support a combination of all the options with particular focus on consumer engagement through a public consultation process (allowing submissions) and the establishment of a dedicated Consumer Panel along the lines of the AER CCP/AEMO ISP Consumer Panel/Powerlink PTI Expert Panel models – to have a challenge role to EnergyCo; rules should say EnergyCo must take account of what the Consumer Panel says and provide reasons why it has not followed the Panel’s advice

- Support Options E.1, E.2 (with a separate Consumer Panel and Local Communities Panel), E.3 (this consultation would include consulting on Consumer Panel submissions made as part of the consultation process in E.5, E.6, E.7
- Members of a dedicated Consumer Panel would be required to sign a confidentiality deed to get access to relevant “confidential” information they need to undertake their challenge role (members of the Powerlink PTI Expert Panel sign these and have access to confidential information). This confidentiality deed should not hinder Consumer Panel members from discussing the broad themes and impacts discussed in meetings with their members and relevant networks, as the current EnergyCo confidentiality agreement requires.

Other Governance issues:

- Support E.11 – EnergyCo to publish and consult on its budget, especially if Option A.3 on roles and responsibilities is implemented; further this consultation has to be much more than AEMO does on its NEM budget through the AEMO FCC which is simply ‘inform’; consider the WA approach where the ERA reviews the AEMO WA budget for prudence and efficiency
- Support Option E.13 – separation of DCEW and EnergyCo and remove conflict of interest

In Summary, we:

Support Options E.1 to E.7 – to improve consultation

Support Option E.11 – EnergyCo to publish and consult on its budget

Support Option E.13 – separation of DCEW and EnergyCo

CONCLUDING REMARKS

Due to the lack of genuine consultation and transparency, it is extremely difficult for consumers to provide a deep insight into the inner workings of the various groups identified. This creates an environment of confusion and distrust at a time when clarity and confidence is required. In particular we emphasise the following:

1. **Timely delivery:** Not only is the lack of coordination across the various bodies an issue, there does not appear to be a single body responsible for coordination of the physical aspects of the transition. For example, we are not aware of any significant studies on resource availability (such as labour and materials) or logistical capability (such as port, rail and road infrastructure capacity and suitability). These practical barriers pose the greatest threat to achieving legislated objectives and it does not appear to be any coordination and/or control over it.
2. **Public interest alignment:** As above, there does not appear to be any genuine alignment across the various groups. A single, responsible entity (such as a coordinator general role or consolidated under EnergyCo) would help create a more structured approach. While there may be a general alignment on the public good associated with climate change objectives we can’t see how other public interest such as social licence or fair cost allocation are being met.
3. **Effective and efficient:** Given the lack of actual progress being made and what appears to be a hap-hazard approach by groups that appear in part to be competing against one another, we can only make an assumption that the current approach is highly inefficient.

4. Clarity: We have zero clarity on process, cost, timing, level of cooperation between groups and coordination amongst other things. From what we can tell there does appear to be significant duplication of effort and resourcing.

We support the design of rules, legislation and procedures that achieve efficient, cost effective and equitable outcomes for networks, developers and consumers. In the energy sector under most circumstances, this is best achieved through a national approach and a sharp focus on the NEO. The current NSW Transmission Planning regime does not meet these fundamental tests.

The EUAA welcomes further discussions with us around the issues raised in this submission.

Do not hesitate to be in contact with EUAA Policy Manager Dr Leigh Clemow, should you have any questions.



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