

11<sup>th</sup> May 2024

Mr James Cox  
Deputy Chair of Australian Energy Regulator

**Re: Reassessment of the HumeLink Project for Material Change in Circumstance**

Dear Mr Cox

Following on from my earlier submissions, I wish to submit a further number of points being:

1. The Amplitude Review has established that undergrounding HumeLink is feasible, at 1.1 To 1.5 times the cost of the overhead option.
2. There is time to reassess the project, as Snowy 2 is significantly delayed.
3. Commitments have been made to the community and must be honoured, as follows:

**Transgrid:**

“If undergrounding is feasible , we’ll reapply the RIT-T and reassess the HumeLink project.”

**Chris Bowen:**

“If Undergrounding was two times the cost of the overhead option, we’d look at it.”

**Chris Minns:**

“The people of NSW have voted to put in a government that will put people at the heart of ALL decision-making, and we’ll not let them down.”

There are 4,322 landowners indirectly impacted by HumeLink, most of whom don’t know about the project. Many stand to lose hundreds of thousands of dollars off the value of their properties as a result of this project. It is unconscionable that the project is progressing without consulting directly with these landowners.

Reapplying the RIT-T to the HumeLink project and considering an underground option would be putting rural people at the heart of ALL decision-making.

4. A recent poll by the Guardian said that 70% of people believed the transition to net zero shouldn’t be at the expense of communities and the environment. Also 65% of people are against overhead transmission lines. It is important to take these opinions of people of Australia into account when making project decisions.
5. HumeLink is going through hundreds of kilometres of bushfire prone land. Building new overhead transmission lines in bushfire prone land is defined by AEMO as a deterioration in system security and resilience, while undergrounding HumeLink would improve system security and resilience.
6. Building HumeLink as an overhead line has significant indirect costs, as follows:
  - a) Increased bushfire risk to communities because transmission lines can cause bushfires, but more importantly, can seriously impede the ability to control bushfires.
  - b) Undermine productivity efficiency of agriculture.
  - c) Reduced biodiversity.
  - d) Reduced system security because of the vulnerability to bushfires and severe weather.
  - e) Profound impacts on visual and noise amenity of regions.
  - f) Undermine regional development.
  - g) Impeded tourism, and

h) Increase exposure to EMF with associated risks to health.  
To determine if these significant costs to the State can be avoided, the RIT-T needs to be applied to the Humelink project and undergrounding assessed.

Yours sincerely

*Rosemary Miller*

Rosemary Miller