

I am writing to provide feedback on the proposed Humelink Project.

I believe the project should not be approved at this time for the reasons set out below.

1. Snowy 2.0 continues to face substantive engineering difficulties. The underlying cause of this is not unambiguously clear due at least in part to a lack of transparency by Snowy Hydro. However there is credible evidence that geological due diligence was not carried out to an appropriate standard prior to commencement of construction, and the main contractor made errors in tunnel boring operations. Snowy 2.0 will not be completed for years, and the eventual cost will be several orders of magnitude higher than original estimates, and estimates provided to government when the decision to proceed was taken.

As of today there is no certainty over Snowy 2.0 completion date nor completion cost.

2. The driver for this project was reaching 82% renewables by 2030. This is unachievable.

3. Moreover, the Coalition adopted a policy of nuclear base load power. The impact of this policy should be taken into account as it has serious implications for renewables generally and new transmission line infrastructure. The Coalition said that government will own the nuclear power facilities and its objective is to reduce energy costs for Australia. Therefore the risk profile of investment in renewables has now shifted higher in a material way. My understanding is Snowy 2.0 and Humelink have service lives well beyond the expected lead time for construction of nuclear power facilities, and for that matter, windfarms and large scale solar elsewhere. Accordingly there is a demonstrable risk of over investment, noting that Snowy 2.0 consumed sunk costs that, if known in the original decision, would have rendered it uneconomic.

4. Assuming Snowy 2.0 to be viable, at any cost, does not advance the interests of energy users. Of course it favours corporate entities and that is not acceptable in my view under the spirit of the framework.

5. I have not seen anything that shows how Snowy 2.0 will secure access to water. You should research the level of mountain dams in the 2019-20 summer, and take the time to understand water loss in a drought like the one that occurred then. Snowy 2.0 does not have a water licence. Yet, I believe that Tantangara will have to be maintained at 70% or thereabouts for power to be generated on demand. Where will the water come from in a protracted drought? Will it be confiscated from other users? If so what are the costs of same versus benefits in a protracted drought when nuclear baseload power comes online?

6. Further, the move to renewables itself is intended to address climate change. Under future scenarios, longer duration droughts of greater intensity and frequency are expected. There will be no snow cover at lower elevations of the Snowy Mountains in the 2030s.

7. So taken together, we have the pumped hydro project running massively over time and over budget with no certainty on end point for either. We have a policy of nuclear baseload power by the Coalition. We have fundamental, unanswered questions on the viability of pumped Hydro at this location under future climate change of more drought years, higher temperatures and no snow. By an entity that does not have a water licence. On top of that, the government itself is now saying gas fired power is essential as part of the transition.

8. Yet you don't believe there is a risk of over investment in Humelink, you want to approve it 3 years earlier than it will be needed, and you assume away the effect on costs to energy users "because you can". No. Not good enough. The thing needs revisiting.

9. The AER has arguably not complied with obligations at law to consultation. Refer QoN Senator Ross Caddell and comments by James Glissan.

Thankyou.

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