

Dear AER,

I believe Humelink should be required to be reapplied to the RIT-T process because the need for the project has changed and it no longer represents appropriate benefit or value to the end consumer. With Project Energy Connect and Snowy 2.0 significantly delayed and the Australian Energy Market Operator's (AEMO's) optimal timing for HumeLink still being 2029-30, there should be no urgency for this project and there is still time to review the HumeLink project within an updated design and cost/benefit framework. The AER cannot be confident that the current HumeLink project will provide a net benefit to consumers.

No high voltage transmission lines of such scale have been constructed in Australia for many decades and, as such, HumeLink forms part of a national upgrade to facilitate a transition to renewables. However, it is obvious that this project as well as other new generation, transmission and storage projects, has been poorly planned, presented and no longer meets the current needs of consumers. To add to this, there are ongoing battles for social licence among communities, land access and usage rights, controversy surrounding the figures quoted Gencost report, not to mention global issues such as increasing costs and reduced availability of finance, materials and labour. This has already been well publicised from current projects Energy Connect and Snowy 2.0.

Expensive infrastructure upgrades like this must undertake heavier scrutiny to ensure that they have overwhelming and long-lasting net benefits to consumers as the national grid and market is undergoing rapid and irregular change. The changes appear to be progressing towards a decentralised grid where multiple generation points and sources can be established near population centres and storage is used on varying scales to sure up reliability. This is increasingly being done on an individual/household level through to larger businesses and communities and can be upscaled to a city/zone level where large transmission networks become less useful and less valuable. With the trend of EV's being realised, it allows users to take care of their own energy needs and buy, sell and transfer energy where and when they choose, albeit with capacity limitations which are expanding as technology and price point progress.

As we undertake the transition to renewable energy sources and storage systems, transmission no longer offers the solution that it has in the past. Using large scale transmission to fill gaps in supply is becoming less cost effective and storage is increasingly seen as more practical as it becomes more accessible, manageable and affordable and different levels.

As more users find their own methods of generation and storage, and disconnect from the "grid", demand on the grid will decrease. The users who can afford to do this will do so, and those who cannot will be left reliant upon the grid and will be exposed to the fluctuations in supply and demand of a transitioning energy market but also exposed to the increasing network costs that such connections bring. These costs will be increased for the remaining grid users and as the overall number of users declines

meaning the vulnerable users who cannot escape an expensive national grid will feel trapped by their dependence.

I say this as I believe we are seeing this occur at the moment and over the past decade. As a result I strongly believe the HumeLink project has changed in its design and value and no longer represents the original design that was approved based on the now outdated 2022 ISP. There is currently an opportunity to transition Australia to renewable energy sources, however it is critical that large scale projects, especially those where costs are going to be recovered via the end users over time, meet a very thorough and rigorous approval process.

I believe that an underground or hybrid option should be fully and transparently explored. Without assessing an underground option for the HumeLink project, the government has shown that they are well and truly focused on delivering this project at the lowest cost possible despite concerns surrounding the suitability of the route, design and delivery of this project and its overall and long-term value to the NEM. This will eventually result in catastrophic and unnecessary consequences to the environment, individuals and their families, businesses and communities, and consumers over time as the expenses of numerous outdated projects are pursued.

If this project is approved by the Minister irrespective of its economic merit or environmental consequences, this will be a major failure of NSW Planning.

Yours sincerely,  
Andrew Purcell