

Hi Contingent Projects Team,

I am writing to comment on AEMO's feedback loop on Transgrid's HumeLink stage 2 proposal.

I believe that Transgrid is in breach of the national electricity rules (NER) and the AER has a responsibility to address this.

Transgrid's Draft 2024 ISP was not consulted on. The latest ISP (2022 ISP) was not used in the feedback loop. As a result Transgrid should be resubmitting the Contingent Project Application (CPA) as they were not eligible to submit the CPA that is currently being assessed.

I also consider the following points to be failures in the Final 2024 ISP:

1. Failure to include all environmental externalities in the cost benefit analysis.
2. Failure to use the approved timetable to model project completion.
3. Failure to represent the project's opex costs correctly by significantly understating them.
4. Failure to complete the 'take one out at a time' TOOT analysis correctly as related projects are labeled as sunk costs.
5. Failure to recognise that the cost of Snowy 2.0 is NOT a sunk cost.
6. Failure to consider a scenario where the Renewable Energy Target is not achieved in order to adequately protect consumers from over-investment and to ensure efficient outcomes.

Please consider the above points when assessing Transgrid's current CPA.

Kind regards,