

As a concerned electricity consumer I feel compelled to voice my strong opposition to the premature approval of the HumeLink project.

Why do I object:-

to ensure that consumer interests are protected and regulatory processes are followed correctly when the current application is reconsidered.

Enforcement of Regulatory Compliance

Rather than instances where the AER has selectively enforced rules, favouring TransGrid over us, the consumers, it is critical that the National Electricity Rules are enforced by the AER both consistently and fairly. Selective enforcement is unacceptable. Selective enforcement undermines our trust in the regulatory process. The AER must uphold the not only the spirit of the law but also the letter of the law, by acting for consumer protections as a first priority, rather than selectively favouring corporate interests.

Re-submission of Contingent Project Application The current application by TransGrid must be deemed ineligible because it doesn't meet the requirements set out in the National Electricity Rules, Version 204 (which version being in force on the 21 December 2023, at the time when Transgrid lodged the application). The application fails to align with the 'most recent Integrated System Plan' since AEMO's failed to follow mandated consultation processes. TransGrid must therefore be required to re-submit their application in full compliance with all regulatory requirements.

Issues with the 2024 Integrated System Plan (ISP)

1. the 2024 ISP doesn't model the approved project timetable accurately. Advancing the HumeLink project by three years is unnecessary and cannot be justified on an economic basis. Early advancement was indicated as optional, rather than mandatory. The 'actionable window' concept, influenced by TransGrid and the Clean Energy Council, should not dictate the project's timeline at our expense.
2. the business case for HumeLink is heavily dependent on the unlikely scenario of achieving an 82% renewable energy target by 2030. The feasibility of this target is unsupported by realistic assessments, thereby making the current investment in HumeLink premature and risky.
3. AEMO's models significantly overstates the benefits of HumeLink. Realistic foresight and modelling should account for unpredictable weather and the actual timing of gas and battery investment, without which such considerations as the projected benefits for HumeLink are misleading.
4. the 'take one out at a time' (TOOT) analysis (methodology applied by AEMO) overstates the benefits of HumeLink by treating essential inclusive investments as 'sunk costs'. A thorough, comprehensive analysis, considering projects like Snowy 2.0 as complementary to HumeLink, is essential for accuracy in the assessment process.

Accountability for Transgrid's Mistakes TransGrid having admitted to locking in contractors prematurely, concede this has led to substantial penalty costs. It is therefore unacceptable to impose these costs onto consumers. The AER must ensure that ordinary consumers do not bear the financial consequences, but rather that TransGrid's shareholders, wear the cost of these missteps. It cannot be in our best interest to rush regulatory approval primarily to mitigate TransGrid's self-inflicted penalties.

In conclusion, I strongly urge the AER to reject the premature approval of the HumeLink project,

By:- enforcing compliance with regulatory standards,- requiring a proper re-submission of the application, and -ensuring accountability for TransGrid's errors, the AER can prevent unnecessary cost burdens while upholding the integrity of the energy regulatory framework.

Thank you for your consideration of my submission.

