

Hello AER,

As a concerned consumer, I am writing to express my vehement opposition to the premature approval of the HumeLink project. Below are several reasons why the current application should be reconsidered to safeguard consumer interests and ensure that regulatory processes are adhered to correctly.

Ensuring Regulatory Compliance

It is crucial that the Australian Energy Regulator (AER) consistently and fairly enforces the National Electricity Rules. There have been instances where the AER has selectively enforced rules, favoring TransGrid over consumers. This selective enforcement is inexcusable and undermines our trust in the regulatory process. The AER must uphold the letter and spirit of the law, prioritizing consumer protection over corporate interests.

Re-submission of Contingent Project Application TransGrid's current application is ineligible because it fails to meet the requirements outlined in the National Electricity Rules, Version 204, which was in effect on December 21, 2023, when TransGrid submitted the application. The application does not align with the "most recent Integrated System Plan" due to AEMO's failure to follow mandated consultation processes. Therefore, TransGrid must re-submit its application in full compliance with all regulatory requirements.

Issues with the 2024 Integrated System Plan (ISP) Firstly, the 2024 ISP inaccurately models the approved project timetable. Advancing the HumeLink project by three years is unnecessary and economically unjustifiable. The "actionable window" concept, influenced by TransGrid and the Clean Energy Council, should not dictate the project's timeline at consumers' expense.

Secondly, the business case for HumeLink is heavily dependent on achieving an 82% renewable energy target by 2030, which is highly unlikely. The feasibility of this target is not supported by realistic assessments, making the current investment in HumeLink premature and risky.

Thirdly, AEMO's models assume perfect foresight, which significantly overstates the benefits of HumeLink. Realistic modeling should account for unpredictable weather and the actual timing of gas and battery investments. Without these considerations, the projected benefits for HumeLink are misleading.

Lastly, the "take one out at a time" (TOOT) analysis method used by AEMO overstates the benefits of HumeLink by treating other necessary investments as sunk costs. A more comprehensive analysis, considering projects like Snowy 2.0 together with HumeLink, is essential for an accurate assessment.

Accountability for Transgrid's Mistakes

TransGrid has admitted to locking in contractors prematurely, leading to substantial penalty costs. It is inexcusable for these costs to be passed on to consumers. The AER must ensure that TransGrid's shareholders, not ordinary consumers, bear the financial consequences of these missteps. Rushing regulatory approval to mitigate TransGrid's self-inflicted penalties is not in our best interest.

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 protect consumers from unnecessary costs and uphold the integrity of the energy regulatory framework.

Thank you for considering my submission.

Damian Cox