

Dear AER,

I am writing to express my deep concern regarding the proposed approval of the HumeLink transmission project, particularly in light of the recent draft 2024 Integrated System Plan (ISP) and its implications for electricity consumers.

As a concerned energy user, I am deeply worried about the potential for my electricity bills to rise due to premature and unnecessary investments in transmission infrastructure. The ISP, as highlighted by the Centre for Independent Studies (CIS), fails to adequately consider the full range of costs associated with the energy transition, including distributed PV, distribution network upgrades, and consumer energy resources.

Specifically, I am concerned about the following points:

- **HumeLink's Timing:** The ISP's analysis does not accurately reflect the approved timeline for HumeLink, potentially leading to overstated benefits and unnecessary costs for consumers. The project's advancement three years earlier than modeled in the ISP raises serious concerns about its economic viability and the potential for over-investment.
- **Lack of Realistic Trajectory:** The ISP's reliance on an unrealistic 82% renewable energy target by 2030, a target that is unlikely to be achieved, further undermines the project's justification. A more realistic assessment of the energy transition is crucial to ensure that consumers are not burdened with unnecessary costs.
- **Overstated Benefits:** The ISP's modeling methodology, including the "take one out at a time" (TOOT) analysis, overstates the benefits of HumeLink by failing to consider the full suite of costs associated with other necessary investments. This bias could lead to a misallocation of resources and unnecessary costs for consumers.
- **Transgrid's Responsibility:** Transgrid's decision to lock in contractors for an unrealistic approval date, resulting in potential penalty costs, should not be borne by consumers. The AER should ensure that Transgrid's shareholders are held accountable for their decisions and that consumers are not forced to pay for their mistakes.

I urge the AER to carefully consider these concerns and to prioritise the interests of consumers in its decision-making process. The approval of HumeLink without a thorough and transparent assessment of its costs and benefits, as well as the broader energy transition, could have significant negative consequences for consumers and the overall energy system.

Thank you for your time and consideration.

Sincerely,

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David Mulholland