

Tuesday, July 16, 2024

Dear AER.GOV.AU

I am writing as a concerned electricity consumer to voice my strong opposition to the premature approval of the HumeLink project. Here are several reasons why the current application should be reconsidered to ensure that consumer interests are protected and regulatory processes are followed correctly.

- Enforcement of Regulatory Compliance It's critical that the AER enforces the National Electricity Rules consistently and fairly. There have been instances where the AER has selectively enforced rules, favouring TransGrid over us, the consumers. This selective enforcement is unacceptable and undermines our trust in the regulatory process. The AER must uphold the spirit and letter of the law, putting consumer protection first, not corporate interests.

- Re-submission of Contingent Project Application

TransGrid's current application is ineligible because it doesn't meet the requirements set out in the National Electricity Rules, Version 204 (the version that was in force on the 21 December 2023 when Transgrid made the application). The application fails to align with the 'most recent Integrated System Plan' due to AEMO's failure to follow mandated consultation processes. Therefore, TransGrid must re-submit their application in full compliance with all regulatory requirements.

- Issues with the 2024 Integrated System Plan (ISP)

Firstly, the 2024 ISP doesn't model the approved project timetable accurately. Advancing the HumeLink project by three years is unnecessary and economically unjustifiable. This early advancement was supposed to be optional, not mandatory. The 'actionable window' concept, influenced by TransGrid and the Clean Energy Council, should not dictate the project's timeline at our 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 modelling 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 unacceptable 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 us from unnecessary costs and uphold the integrity of the energy regulatory framework.

Thank you for considering my submission. Jack Harrison