

I am writing this as a member of the general public and electricity consumer already concerned about the increase in power bills and even more concerned about the future costs to consumers with the approval of the HumeLink project. I expect the regulator to protect myself and consumers from any unnecessary bill increases and therefore I reject the premature approval of the HumeLink project based on the following criticisms.

1. I expect the Australian Energy Regulator to enforce legal requirements consistently, and as a priority, to protect consumer interests above political and corporate ones. AER has already prioritised TransGrid over consumer interests and this kind of selection bias undermines the public trust in the regulatory process. "The duty of the AER is to ensure that the Rules have been complied with both in the spirit and in the letter of the law." - James Glissan AM ESM KC
2. TransGrid's submission of the Contingent Project Application doesn't align with the latest Integrated System Plan, which appears to be a failure in the consultation process by the Australian Energy Market Operator. TransGrid should re submit the application in line with the requirements. It makes no sense to be assessing an application that doesn't correspond to the ISP.
3. During consultation, critical flaws were acknowledged in the 2024 Integrated System Plan which affect HumeLink and haven't been corrected. The new Feedback Loop notice referring to the final ISP hasn't improved this. Centre for Independent Studies has criticized this thoroughly here, and I support their criticism <https://www.cis.org.au/publication/submission-to-draft-2024-integrated-system-plan/>

The benefits of HumeLink appear to have been overstated and not based in reality. HumeLink is dependent on achieving the 82% renewable energy target and this target is not supported by real world examples or honest assessments. A more realistic trajectory must be considered. The current one is verging on prophecy and almost faith based like prediction of future events such as weather and market investments. Consumers should have the confidence and the right to know they are not paying for premature and risky investments.

4. TransGrid has admitted to taking on contractors early and tried to rush through the process to avoid huge penalties. Electricity consumers should not have to pay for the mistakes of TransGrid, they are responsible for this and therefore should pay.

In light of these criticisms, I urge the AER to reject the HumeLink project at this early stage. I trust the AER to put the consumer above political or corporate interest by enforcing adherence to the regulatory rules, as well as corrections, or at very least, accountability by TransGrid of its errors.

Thanks for taking the time to read and consider.

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