

Re: Failure of the HumeLink EIS Submissions Report and Amendment Report to address legitimate community concerns with the HumeLink Project

Dear AER,

I have reviewed Transgrid's EIS Submissions Report and Amendment Report. These reports fail to address our legitimate concerns with the HumeLink project. Overall I found that many of the concerns were dismissed without thoroughly addressing the topics. I believe that many community concerns have still not been adequately assessed. I also believe that HumeLink is not a project that the AER can confidently say has the best interests of the energy user as a priority.

Firstly, I will address a couple of specific comments from the Submissions Report that are meant to address certain issues that I raised in my submission.

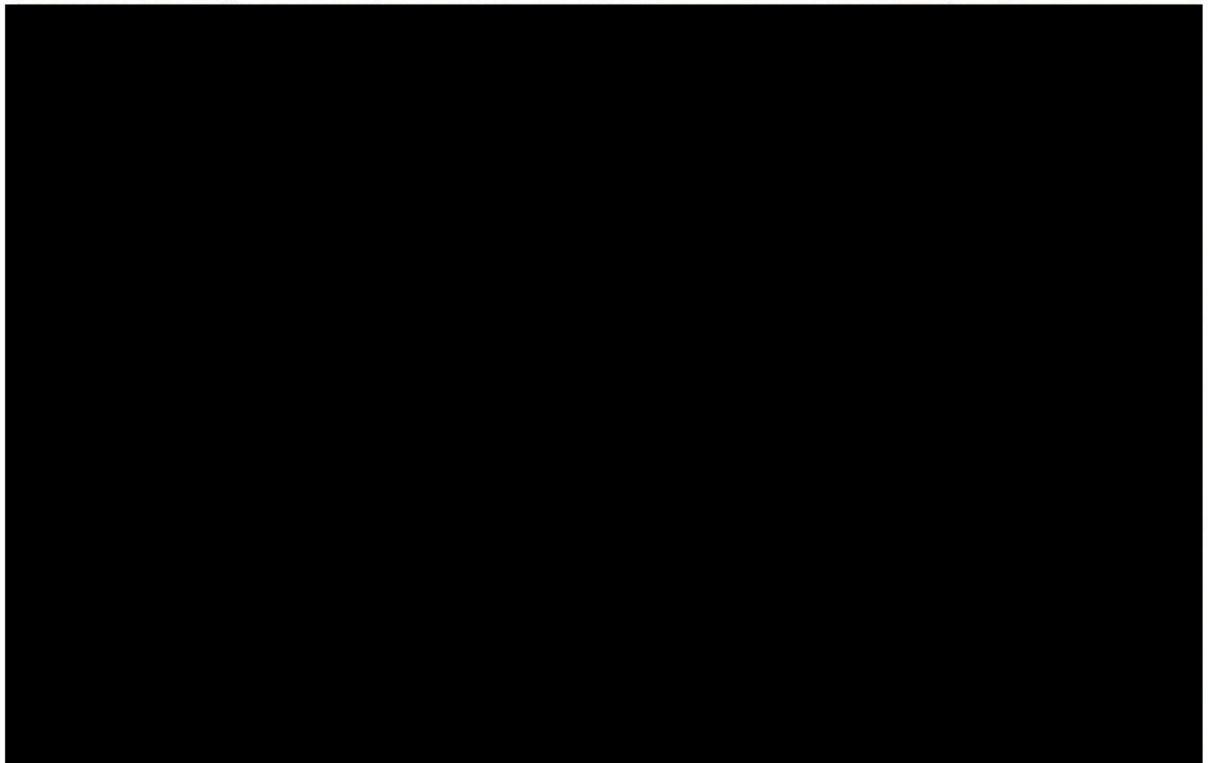
1. I raised concerns about the accuracy of the information used to refine the route by using desktop mapping. The EIS shows a plantation near our property that does not exist and may have influenced where the final alignment is. I raised this as it is an example of why the community are not confident that full and correct information has been used when planning the project. This aspect of my query has not been addressed, Transgrid have only addressed the mapping used.

In the Submissions Report, Transgrid address this concern with the following paragraph:

"It is not clear which section of the EIS the submission is referring to when stating that a non-existent "plantation across the river" has been included in the mapping. The GIS data used by Transgrid and GHD did not include any plantations along the Tumut River north of Blowering Dam."

In my submission Tumut North Route referred to the section of the line that Transgrid named, not a location. The map Attachment D: Forestry and land use Page 3 of 10, from Land Use and Property Impact Assessment EIS Technical Report 5 clearly shows a plantation along the Tumut River. A copy of this map is below, along with a google maps view which clearly shows no plantations in the area. I have added a red circle to indicate the area. To me this is a failure of Transgrid to properly consult with landholders and ground truth their data. They have also failed to properly address the issue raised. It would also have been easy for them to clarify with me what I meant in my EIS submission, as they had my contact details. Instead they have dismissed my query regarding the mapping and failed to address the

question of the quality of information used.



Source: Base data aerial imagery, Parcort, water and cadastral (owned) NZR Foundation Spatial Data Framework, Transgrid

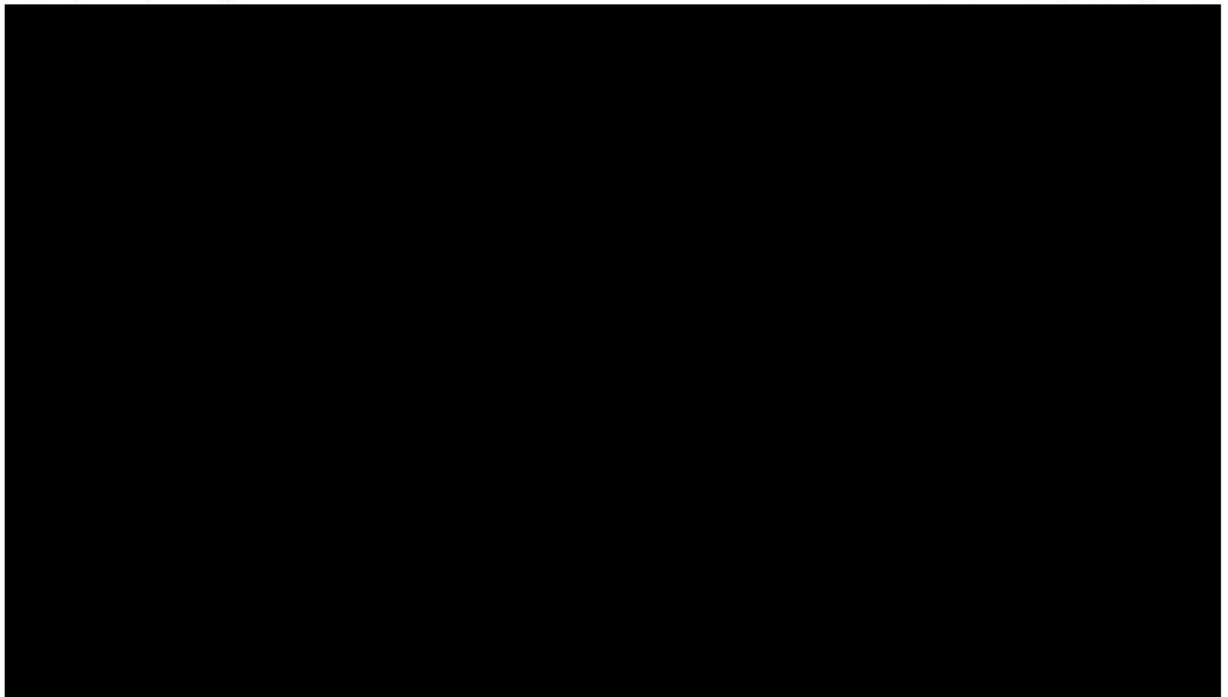


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Projection: GDA 1994 MGA Zone 55

HumeLink

Attachment D: Forestry land uses Page 3 of 10



2. The quality of community consultation has long been a concern. Transgrid have yet to acknowledge that they have failed our communities by limiting consultation, delaying responses to queries, and even at times failing to respond at all.

Page 2-5 of the submissions report lists the newspapers they advertised some information sessions in. The Tumut and Adelong Times is not included in this list. As a highly impacted area this is a failure to openly consult.

The submissions report dismissed these concerns by saying that they have improved since the beginning and adopted some recommendations from a review. On the ground, consultation may have improved slightly but has not met the expectations of community and landholders.

3. While Transgrid continues to dismiss underground HVDC technology as an appropriate solution for HumeLink, their reasons for doing so directly contradict their project scope.

On page 7-10, underground HVDC is dismissed with the following statement:

“Transmission projects, including HumeLink, which form part of the NEM’s energy ‘superhighway’ require HVAC transmission lines that will act as collector lines. These lines are designed to collect large volumes of renewable energy across their routes rather than a point-to-point delivery.”

Transgrid continually tell the community that HumeLink will not act as a collector line, and that it will be a point-to-point project. I would argue that the above paragraph shows that HumeLink is in direct contradiction to the project proposed in the PACR and PADR. As such, the project Transgrid are planning to build is not the project they have been assessing and should not be approved by the AER.

I strongly believe that an underground option would largely avoid impacts of concern with the HumeLink project.

The second NSW parliamentary inquiry into feasibility of undergrounding transmission was supportive of undergrounding transmission, recognising that we need environmentally responsible transmission, as well as generation, as we transition to net zero.

With Snowy 2.0 significantly delayed and the Australian Energy Market Operator’s (AEMO’s) optimal timing for HumeLink 2029-30, there is time to review the HumeLink project and adopt an underground solution. Why is this timing being ignored? The AER cannot be certain that there will be any net benefit if this project is rushed through before the optimal timing in the ISP.

A recent poll by the Guardian said that 70 per cent of people believed the transition to net zero shouldn’t be at the expense of communities and the environment. Also 65 per cent of people were against overhead transmission lines. It is important to take these opinions of the people of Australia into account, when making project decisions. Transmission lines completely industrialise rural landscapes of great natural beauty for hundreds of kilometres, and have no social licence.

Governments overseas have come to the conclusion that when you take into account all the environmental costs of overhead transmission lines, undergrounding is the overall lowest cost option. A recent paper by the National Parks Association (NPA) states that ‘almost all new transmission links are underground throughout Europe, in fact are mandated in some countries, and much of Asia’, (*Going underground with the transmission connection for Snowy 2.0*, NPA, January 2021, p5). Engineers are telling us that there have been major advances in underground cabling

technology, it is entirely feasible, and the world is looking on in disbelief as Australia builds more overhead transmission lines.

Without assessing an underground option for the HumeLink project, the government cannot be confident that the best option is being undertaken.

If this project is approved by the Minister irrespective of its economic merit or environmental consequences, this will be a major failure of NSW Planning. We urge you to require the project be reassessed and an undergrounding option be considered.

I am asking that this project be reassessed so that the AER can be confident that the best project has been proposed. To approve HumeLink in its current form, with its inadequate assessments, will be a failure of the AER to ensure that the best interests of electricity users have been protected. Consumer interests need to come before those of corporate or political interests. Consumers should not be penalised for Transgrid's failures to plan and consult, or for their contractual obligations entered into prior to project approval. There are also questions surrounding the approvals process for this project so far, regarding how rules have been enforced or overlooked by AEMO and the AER. To satisfy the regulations and the community Transgrid need to reassess and start their project approval processes again.

Yours sincerely,

Rachael Purcell