

To Whom it May Concern (AER),

I ask that the AER not approve HumeLink overhead funding, as the feasibility of undergrounding HumeLink is a material change in circumstance for the project.

We are impacted by the devastation of HumeLink. As a family member of an impacted landholder, a community member, and a community advocate who has borne witness to Transgrid's blatant disregard to people, their safety, communities and the environment, I would like to take the opportunity to provide comment on the ISP Feedback Loop.

Transgrid always lead with transference of blame to the regulators, as if they can be wiped of responsibility, and as the regulator we urge you to do better.

As a consumer, I want the regulator to protect me and those impacted, people and communities. I want to ensure that we as consumers are paying for the 'right, next generation, world's best practice' infrastructure that doesn't have disastrous impacts and costs on people, communities, agriculture and the environment. And I want the AER to ensure funding for HumeLink is not approved before the project is needed.

As a consumer we expect the AER to enforce the letter of the law consistently, and always take care to protect consumer interests above corporate or political interests. It appears to the public that AEMO and Transgrid in this case has been given 'leniencies' to 'skip' consultation and expected process. As stated, we expect the following:

"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

Transgrid should re-submit the Contingent Project Application, Transgrid should not have been eligible to submit the application that the AER is currently assessing, the Draft ISP 2024 was devoid of consultation when the previous feedback loop was undertaken. An 'update' is not sufficient as the "most recent Integrated System Plan". It is required that the Feedback loop should be undertaken with the 2022 ISP , without this the AER has failed in its obligation.

The 2024 Integrated System Plan has acknowledged critical flaws that affect HumeLink raised in consultation, but has failed to correct them. The final 2024 ISP ignored submissions arguing that the ISP should model the completion of the project at the timetable approved. Step change suggests that HumeLink is not needed now, and optimal timing is projected at 2029-2030, but likely with Snowy 2.0 delays, this will be even later. It appears beneficiaries of the HumeLink Project are working on an actionable window requested by Transgrid (the beneficiaries) themselves, and does not fall into the 'need' of the project coming online, or the optimal timing.

HumeLink is still not 'approved', yet spending for 'Early Works' has been rushed through and similarly further spending ahead of approval. HumeLink should not be executed earlier than optimal, as is the case it will not be required earlier.

The biggest driver for HumeLink is Snowy 2.0, and dependent entirely upon the 82% Renewable Energy Target being achieved by 2030. Experts are forecasting that 82% will not be achieved. The AER must consider that consumers can't be adequately protected from over-investment if a more realistic trajectory is not considered.

The TOOT analysis method overstates the benefits of HumeLink, by treating all the other requisite investments as sunk costs. It is simply not 'fit for purpose', Snowy 2.0, VNI West, and HumeLink should all be included and assessed together, not one of these projects can exist without the others to meet their requirements. Therefore the social and environmental externalities should all be seen 'together' for ALL projects and should not be assessed in isolation of each other.

Consumers should not pay for a proponents mistakes, in this case the proponent being Transgrid should foot the bill for any penalty cost. In their Contingent Project Application, Transgrid admit they've locked in contractors for an unrealistic approval date, and have begged the Regulator to rush things along to avoid penalties.

The regulator should ensure, and demonstrate transparently to consumers that Transgrid's shareholders should pay for their Board and CEO's mistakes. The project doesn't have regulatory approval, it's not in the consumers' interest to rush it, and if the CEO has taken unjustified risks, consumers should not be forced to compensate. Particularly when Transgrid suggest that they're rushing things for a schedule set by AEMO's ISP, but Step Change analysis suggests the project should be delayed by years.

Don't approve HumeLink overhead. Undergrounding HumeLink is the best, safest and cheapest long term solution for Australia and it's consumers, one that protects us all and generations to come!

Regards,

Rebecca Tobin