

Australian Energy Regulator

Via email; [energyqueensland2025@aer.gov.au](mailto:energyqueensland2025@aer.gov.au)

## **Energex – Revised Regulatory Proposal 2025 – 2030**

The Electrical Trades Union of Australia (ETU) Queensland and Northern Territory Branch is the Electrical, Energy and Services Division of the Communications, Electrical, Electronic, Energy, Information, Postal, Plumbing and Allied Services Union of Australia (CEPU). The ETU Queensland and Northern Territory Branch represents over 6000 electrical supply industry workers employed by Energy Queensland and its contractors which Energex is a subsidiary.

The ETU welcomes the opportunity to make a submission to the AER relating to the Energex revised regulatory proposal.

### **Background**

Queensland is in a period of strong economic, population and jobs growth, particularly in the South East region. As our communities in South East Queensland continue to grow, there will be more connections to the network and increased demand for power. This is coupled with Brisbane hosting the 2032 Olympic and Paralympic Games, which will drive expansion across areas of the network to ensure we consistently maintain our safety and reliability obligations.

We are experiencing increasing number and severity of extreme weather events, as such the Energex network must have increased augmentation and resilience spending to ensure a safe and reliable network.

## Concerns

The AER did not accept a large portion of the Energex proposed investment intended to cater for the significant growth within the South East Queensland region. The main driver for the AER's Draft Decision is that it disagreed with Energex interpretation of a jurisdictional Distribution Authority requirement known as the Safety Net.

Given that the Queensland regulator, being the Department of Energy and Climate, supports the Energex interpretation and that Energex has been operating that interpretation since 2014, we submit that Energex and the regulators interpretation of the Safety Net provisions, and the resultant projects that form part of the Energex augmentation capex submission, are required to meet Energex's Distribution Authority obligations. This must be addressed by the AER.

The proposed reduction to augmentation spend will leave electricity customers in the South East in the dark. This investment is needed and is further reinforced with load driven outages last summer and again this week. The required use of temporary generators is not a satisfactory long term solution for peak load times nor a prudent allocation of funds. This is not sustainable during the 25-30 regulatory period.

The proposed reduction to Resilience spend must be addressed. During the early 2024 summer storms concrete poles were- sheered and fell to the ground. With the increasing extreme weather events resilience spending should be increased to protect our communities.

## Summary

With significant population growth and increasing extreme weather events in our view the AER must allocate sufficient funds to ensure a safe and reliable electricity network.

In the current determination period, the Queensland Labor Government approved the overspend required, with the LNP Government being elected through until 2028 there is a real risk that they will not allow any overspend which will lead to increased outages, increased asset failures, increased loss of life.

The ETU would welcome the opportunity to discuss in detail our concerns outlined above and to share any examples or experiences that may be useful to the AER in formulating its determination.