



Secretary: [REDACTED]
KINGSTON VIC 3364

Sebastian Roberts
Expenditure Australian Energy Regulator (AER)
GPO Box 520
Melbourne VIC 3001

17 December 2021

Attention: Sebastian Roberts, General Manager, AERInquiry@aer.gov.au

Dear Mr Roberts

AER – Submission on AusNet’s Claim for Cost Pass Through - Storm Damage Costs

The Kingston & District Power Alliance (**K&DPA**) is working collaboratively with Hepburn Council and a number of community groups who are concerned about the impact of the Western Victoria Transmission Network Project (**WVTNP**) on the Hepburn region and beyond. We are concerned about AusNet’s proposal to build overhead lines through Hepburn which is an area known for extreme winds and thunder storms.

The purpose of this letter is to make a submission on AusNet’s claim for costs arising from storm damage in June 2021 which affected distribution lines. The storms have been treated as a natural disaster pass through event. It is reasonable to expect that storms of this kind will increase in frequency in the years ahead.

Our submissions are as follows:

1. The community’s expectations have changed. It is time for the Commonwealth and State governments to force electricity companies to introduce technology that improves reliability and safety for the community. The status quo is no longer acceptable to the community.
2. There is no incentive for electricity companies to introduce new technology when there is the right to call on consumers to fund problems which could have been avoided if new technology had been introduced.
3. As a community group, we do not have the expertise to express a view on the \$36m claimed. As the Regulator, AER needs to fully scrutinize whether AusNet is seeking

to profit from the June storms. Also, at least some of the vegetation clearing costs that have been claimed are costs that AusNet should have incurred in any event if it was carrying out its activities to a reasonable standard. Allowing AusNet to claim these costs permits double dipping.

4. AusNet should not be compensated for payments that it was required to pay consumers under the Guaranteed Service Level requirements. This would allow AusNet to charge consumers for compensation paid as a result of AusNet's lack of service.

Yours sincerely

Kain Richardson
Chair
Kingston & District Power Alliance