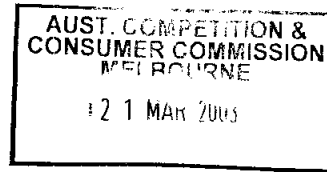


POWER DOWN UNDER GROUP  
C/- Shona Rice  
"Woodlands"  
694 Cudmore Road  
GREENMOUNT QLD 4359



Mr. Sebastian Roberts  
General Manager  
Regulatory Affairs-Electricity  
Australian Competition and Consumer Commission  
GPO Box 520J  
MELBOURNE VIC 3001

19 March 2003

FILE No: M2002/468-06.
DOC: D03/11548
MARS/PRISM:

Dear Sir,

RE: MURRAYLINK APPLICATION

On behalf of the Power Down Under Group, I ask that you accept this letter as a submission in relation to the Murraylink application for regulated status. In terms of your Issues Paper, I believe we are asking you to take account of the community cost of transmission lines, and the need to promote competitiveness and technological progress, in addition to the matters currently contained in the regulatory test.

In making this submission we are aware of other submissions to you, especially that by Powerlink dated 28th February 2003 which states that the decision on Murraylink's application may open the way for Powerlink to contemplate "tactical undergrounding" for new projects in rural areas in certain circumstances. That appears to be a reference to AC undergrounding, not adoption of the DC underground system as used in Murraylink.

Power Down Under represents 105 landholders directly affected by Powerlink's proposal to build a high voltage overhead transmission line from Millmerran to Middle Ridge, as well as their wider communities. A plan of the route is attachment 1.

This is a good example of the severely adverse economic, social and environmental effects, which I refer to as "community costs" which large cross-country overhead lines can have on rural communities with the kind of close settlement and high-value land use including rural residential use involved here.

In our case, we consider those community costs of the proposed high-voltage overhead line and its easements have been callously disregarded by the proponent, Powerlink.

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In fact, the overall conduct of the proposal by Powerlink has left a great deal to be desired, starting with its failure to disclose this planned line until August 2002 and its failure, prior to that, to disclose the possibility of a line to those conducting property searches (while claiming it plans the distribution system 15 years ahead).

As the name suggests, we have pressed from the outset for consideration of the advantages of the latest DC undergrounding technique, as used in Murraylink. However, Powerlink and the Queensland Government have so far been unreceptive, and have sought to discredit the DC underground system, for example with claims it would cost 15 times as much as a conventional overhead line. This behaviour and the attitude behind it appear contrary to the principles of economic efficiency.

For this project, the contrast of impacts between conventional overhead line and DC underground line could not be more striking - the conventional overhead line going cross-country via easements would inflict extremely adverse economic, social and environmental effects on some 105 landholders and their communities, with individual property owners suffering the most, notwithstanding compensation laws. The DC underground system with no easements would have virtually nil adverse impact.

It seems to us that the community cost of such a cross-country overhead line requires proper independent assessment, and we ask that the ACCC consider whether a study could be commissioned as part of its own inquiry. While Powerlink is conducting an environmental impact assessment, it is an in-house project conducted and controlled by Powerlink itself.

Powerlink, with its fixation on conventional overhead technology, has made objective assessment of its plans for Millmerran to Middle Ridge even more difficult by isolating it from the rest of the plan, which would carry the transmission line on to the Logan/Brisbane South and Gold Coast regions by 2009. Based on Powerlink's failure to give us timely warning of this section, there must be a likelihood that those extensions beyond Middle Ridge will happen earlier than 2009.

When the consideration embraces the whole package including those extensions into even more closely settled rural areas and urban areas, the case for adopting new technology which avoids almost all the community costs of the old overhead cross-country lines would be stronger still.

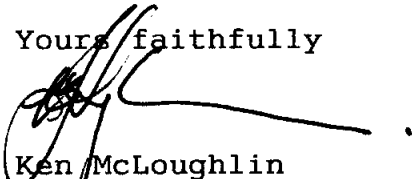
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Rather than write at length about the impacts of the proposed overhead transmission line which concern us, I will rely upon the coverage already before you, especially in the submission by our members GJ & SA McNally, and the report by Kellogg Brown and Root Pty Ltd on "Environmental and Planning Issues" which is an attachment to the Murraylink submission dated 28th February 2003.

Our Group would of course be pleased to provide any further information we have, and assist the ACCC in its inquiries in any other way we can. In particular we would welcome the opportunity to meet your officers or consultants, and show them the things we are talking about, if that is possible.

We trust that you will see fit to take the community costs issue, with all its wider implications, into account in considering the regulatory matters before you in the Murraylink matter.

Yours faithfully



Ken McLoughlin  
Chairman  
Power Down Under Committee

# Proposed Transmission Corridor

ATT. 1.

