



Submission to the Interim Report – NSW Transmission Planning

Our Response Theme

*Before accelerating over communities - build trust
through competency and capacity building - reform top-*

25 July 2025

ReD4NE Inc -

Community Alliance for responsible energy development for the New England

30 July 2025

Richard Owens
Farrierswire

Dear Richard and Review Team

Thank you for your indulgence on submitting our response to your Interim Report ('IR'). As explained the existence of the Review only came to ReD4NE's attention mid- July. We have moved quickly to brief our members and the broader community as to the importance of getting our key comments on the table. We do this despite , our ongoing dilemma the overwhelming evidence the Government doesn't seem disposed to understand or even respond to our concerns. Since taking office the Minns Government have shown little to no interest in our issues or views – we, despite being the largest NSW REZ, have never secured even an acknowledgement from the Premier, the Energy Minister or the Planning Minister. Enough said.

By way of introduction, ReD4NE is, as our letterhead introduces, is a well-structured organised and incorporated alliance of Community Groups in the New England. Our members, represent rural and regional communities interested in advocating for responsible energy development for the New England REZ ('NE REZ') . REZ Communities which host infrastructure -including large scale generation and transmission -which help keep the lights on in the cities. So we represent real communities that your IR should so reference. This is particularly pertinent in that the IR reports and recommends “ ... *a series of targeted reforms that should be implemented as an immediate priority to accelerate planning and delivery of the New England REZ ...*”¹

We get that it's our turn to deal with RNIPs and PTIP² - new grid ,grid upgrade and improvement. For the purposes of this response - ReD4NE **doesn't disagree** with the need for better co-ordination -more efficiency and for the eradication of costly duplication of transmission planning. However consistent to the underlying theme of our response we only ask that it be **done with in partnership** -we say '**top-down governance – bottom-up meaningful engagement**' and **with requisite competence**. To date, on our observation, that has been a missing commodity.

Therefore and with respect to the well qualified and experienced Review Team ,ReD4NE doesn't offer **unqualified support** to the IR's proposal to bless Energy Co with an expanded and elevated role to co-ordinate transmission planning in NSW. Based on our experience with Energy Co to date there are demonstrable reasons why we would question Energy Co's competency to plan, communicate and deliver on a major large infrastructure project like New England Link. What we observe from the get-go is another city-based bureaucracy -high on 'net zero' ideology but light on understanding and deploying effective engagement with rural

¹ Interim Report -Executive Summary P 5

² RNIP - REZ Network Infrastructure Project – PTIP- Priority Transmission Infrastructure Project

and regional communities. So our message as developed hereunder is Energy Co's go forward is beset with competency issues -partly derivative of its inherent DNA -and partly its strategy structure and resourcing. Accordingly **the word 'accelerate' makes us nervous.**

As part of our introduction it may help to contextualise our experience with the Roadmap and REZ rollout. ReD4NE predates the Electricity Infrastructure Investment Roadmap ('Roadmap') and therefore predates the NSW Electricity Infrastructure Investment Act 2020 ('EII Act') and therefore NE REZ declaration. ReD4NE was set up to formally respond to increasing 'cowboy' developer irresponsible development practices partly encouraged by the NSW Renewable Energy Action Agenda.

Setout hereunder is five (5) summary points; **Points 1,2 and 5 are obvious relevance to the ToR for the IR.** Whilst remaining highly relevant to Communities, it accepted that the concerns point 3 and 4 are expressly outside the ToR. Nonetheless our submission is they can't be divorced from anyone's assessment on reviewing Transmission Planning – in fact they are consistent with the functions of the Infrastructure Planner –(s 63 EII Act 2020) :

1. Planning for the establishment of the initial 3 REZs in NSW was based on academic desktop resources research. A generation target of 8GW installed for the NE REZ was seemingly randomly selected and erroneously declared in legislation. There was no strategic land use planning – nor assessment of potential cumulative impact from over development. There was no social impact assessment as to workability and liveability. For construction there was no resource availability assessment nor transport accessibility assessment.
2. There was zero community consultation by the NSW Government on the REZ rollout – references to social licence were just spin and no substance. Local Government Associations often financially stressed, where complicit as financially captive to the NSW Government.
3. The supporting planning governance was antiquated -not fit for purpose Environmental Planning and Assessment Act 1979. Tick the box process planning approval design for the comfort of the developer. Governances processes and procedures were designed to punish communities and reward developers. Little scope to protect the interests of communities on decommissioning.
4. Developer approaches to communities were based on divide and conquer within communities creating division and unnecessary anxiety and deceptive misleading conduct in locking down sites for land banking. Disregard to public interest - planning consent pathway was overly drawn-out creating unnecessary uncertainty and costs in communities. Little to no testing of project economic viability as to improve affordability, reliability security and sustainability of supply.
5. Transmission Corridor Planning – based on antiquated generator developer expressions of interests. Inexperienced Energy Co staff – unable to offer transparent information and feedback – no real knowledge of large-scale transmission development .No experience in insurance ,finance or agricultural industry issues.

Clarifying Streamlining and Co-ordinating Transmission Planning in NSW

The obvious a core question in the IR's ToR. From the Communities perspective the debate is complex and confusing -and yes with unclear accountabilities ,inefficient outcomes and delays. We note multiple bodies all dipping their oar in the water with little success. From where we sit – Transmission Development – Rewiring the Nation seems a mess – unfinished ISP projects, uneconomic ISP projects – Energy Connect, VNI West, Humelink and Energy Co actionable CWO REZ etc all confirming as transmission calamities.

As the IR establishes Transmission Infrastructure is complex in planning and delivery -we get the interest in Chapter 2 of the *need to clarify, streamline and co-ordinate responsibility* in NSW. We will again distinguish our opinion from the IR as we believe based on our experiences and observations there is ample room to criticise the Roadmap and it's outcomes. As we report in our introduction that we predate the Roadmap and we are on the record most recently with NSW Government Upper House Inquiry into REZ³ in our belief that the NE REZ, **in policy and delivery is broken. Is it fundamentally broken beyond repair ?** The answer to that partly lies in whether prudent reform, on clarifying streamlining and co-ordinating, injects some certainty efficiency and competency into transmission planning process.

As will be noted our response makes a lot of noise about '**competency**'. We are unapologetic about that – large scale 500KV is not 'here today-gone tomorrow' infrastructure it's multigenerational and it's pervasive on the landscape and most importantly on the liveability and workability in our communities. 'Competency' is not a by-product of speed skating reform - it evolves from careful planning, knowledge and experience as to the technical issues - particularly in a rural and agricultural settings. It embraces adaptability as to plans and process and lastly it involves bi-lateral engagement -particularly listening -and this doesn't just present as empathy devoid of accountability . It must be understood all these traits contribute **to building trust**. Can Energy Co step up into this space with just 'nip and tuck' legislative reform ? We say the remedy cuts deeper into Energy Co's organisational DNA.

In terms of the Roadmap and its objectives of its enabling legislation EII Act 2020 we observe as follows.

Section 3 Objects of the EII Act

- a) To improve the affordability, reliability, security and sustainability of electricity supply
- b) To co-ordinate investment in new generation, storage, network and related infrastructure
- c) To encourage investment in new generation, storage, network and related infrastructure by reducing risk for investors
- d) To foster local community support for investment in new generation, storage, network and related infrastructure
- e) To support economic development and manufacturing
- f) To create employment, including employment for Aboriginal and Torres Strait Islander people
- g) To invest in education and training
- h) To promote local industry, manufacturing and jobs

³ MLC Hearing Armidale 17 July 2025

The drafting of 'objectives' of any legislation is crucial as to intent and accountability. As confirmed hereunder we concede this equally applies to stakeholder engagement. We say there is a widening gap between the intent of these objectives and delivery- after 5 years the transition **hasn't really moved the 'objective' needle** -we question was it essentially legislative spin ?

- a) **Investment** in electricity is showing **no signs of improving affordability** – energy prices in NSW are now some of the highest in the world – energy poverty is now a reality in our society – people are having to make hard choices between food on the table and paying energy bills.
- b) **Investment** in new generation is **limping rather than galloping** – the risk and returns are increasingly uncertain against the backdrop of increasing scepticism of the value of 'net zero'. The NEM is broken.
- .
- c) **Social licence is contracting.**
- e) **Manufacturing is contracting** – solar panel manufacturing in Australia is an illusion and all we seem to be doing is propping up existing steel and aluminium basket cases. There zero evidence of energy intensive industry moving to the REZ. Hydrogen has flopped again.
- f) **No employment for Aboriginal communities** in the NE REZ.
- g) What **education and training** ? We have a jobs advocate – never seen him or her.
- h) The outlook on jobs remains **the same** ,nothing sustainable –S. 457 workers during construction – a sugar fix for the pub and the cake shop – minimal FTE after commissioning.

We table these objectives for a number very relevant reasons to the ToR for the IR.

Somehow, they all quiet rightly go to objectives to getting Transmission Planning on a more stable and efficient footing.

- **Structure before Strategy** -The rollout was 'a speed skating' exercise by the then Minister for Energy and his ministerial and bureaucratic acolytes. Yes, Liddell end was imminent, but it was well and truly on the table. As we interpret from the Health Check confirms clouding up Eraring's future was a matter of convenience. The then Minister was pushing the line that it would be closed August 2025 (next month) as said by Simon and Garfunkel " *hello darkness my old friend*" ⁴History should confirm that the Roadmap was high on 'net zero' ideology and light on strategy and planning. If the speed skating juggernaut's ambition was to create a mousetrap to confuse rather than clarify then it achieved its mission. We remain cautious as to further fast tracking
- **Genesis of Energy Co-** Whilst the concept of an 'Infrastructure Planner' was probably solid in governance theory - in practice the creation of Energy Co and it's appointment to the role was probably at best clumsy at worse negligent. Undoubtably its genesis so described hereunder contributes to the uncertainty as to responsibility -and erosion of accountability on transmission planning. As history confirms Energy Co's DNA emulates from an unused dormant vehicle found in some bureaucratic bottom draw. It

⁴ 'Sounds of Silence' -originally released in 1964 – and released as a single in 1965

was created for service pursuant to the NSW Energy and Utilities Act 1987 and it conveniently came with a ‘tow bar’ installed – compulsory land acquisition powers.

In the era of ‘*anyone but TransGrid*’ the said vehicle was given a legislative face lift - some lipstick and promoted as *Energy Co -the Infrastructure Planner* . It was thrown into active service as a tool of the Minister through temporary resourcing from the then Department of Planning . These temporary resources were primarily from its ,hardworking, DPE Energy Resource Assessment Unit -who were skilled in planning by process only -who were not skilled in communication and engagement and who had no experience in large scale infrastructure development . These ‘on loan’ resources were then supplemented with an ongoing gaggle of consultants – ideologically committed, empathetic but with zero empowerment to answer the most basic design questions. It was really challenging for these ‘*young soldiers*’ armed in field with crayons and iPhones, to account for an organisation which was still trying to establish its own identity.

The energy transition is quite rightly referenced as once in generation - the most significant technology and economic shift since the industrial revolution. It will continue to have significant impacts on the rural and regional landscapes . People in the bush and their place where they live, raise families and work. Yet the pivotal agency co-ordinating REZ development and transmission planning is ensconced, as if they were merchant bankers, in suites in **Bond St** in Sydney’s CBD. It has a CEO , 6 executive directors at Senior SES levels all of which have considerable regional responsibilities. Meanwhile the office in Armidale remains paid for but underutilised – ‘*the lights are on, but no one is at home*’ We make no apologies for painting a picture akin to an episode for the ABC satire ‘Utopia’.

- **Cost v Benefit.** We the Community/Consumers – have no idea what Energy Co costs the consumers and taxpayers of NSW. It appears substantial which we are sure it’s Annual Report 2024-25 will disclose. It is hoped that transparency is increased on the costs and benefits of contestable RNIP and PTIP projects for the New England . The high-level information provided in the CWO was on observation inadequate – it remains secretive between AER ,AEMO Services, the DCCEEW and Minister. That is inadequate transparency – we acknowledge the need to reduce the number of entities reporting to communities, but it also goes to the quality and adequacy of the information on offer. For example as summarised hereunder Energy Co can’t even offer an indication of the cost benefit of building 3 substantial hubs within 36 Klms of Walcha ? This appears to be inconsistent with the objects of the EII Act⁵ ‘ *to improve the affordability, reliability, security and sustainability of electricity supply*”

Enhancing Engagement Consultation with the Community.

In terms of Chapter 4 we are concerned that the IR’s Draft Recommendations⁶ that by 2026 there are actions to enhance engagement and transparency (C1). Communities are once again relegated to second place behind streamlining activities. There is a consistent message from Communities that transmission planning **is done to them rather than with them.** As the IR confirms this most evident in that the EII Act is silent as to the need in its Section 3 Objectives to engage with Communities. This is demonstrable that this was the intent of the Ministerial Juggernaut and the DPE bureaucrats of the day **the Communities have no stakeholder status,**

⁵ Section 3 EII Act 1920

⁶ P 6 NSW TPR IR 27 June 2025

and this is reflected in the demeanour and conduct of Energy Co. As alluded to in our contextual reference highlighted above this ‘don’t make eye contact with the local communities’ has been evident from the get-go. There was no consultation -no explanation of what the REZ was and what it would mean prior to it being declared with an 8 GW target. Such declaration as highlighted in IR contravenes the EII Act – as the Minister is required (Section 19 (4) (b) (iii))⁷ to consider the views of the Community before making such a declaration. We are not aware of any process where the Minister sought such views - if so, it is open to consider the declaration as flawed. We are pursuing this remedy separately with DCCEE.

This paucity of engagement continues as Energy Co continues to busy itself on directing a PTIP or RNIP in a vacuum of information and in a ‘*field of dreams hope scenario – build it they will come*’. Communities are left frustrated waiting for or not getting answers to basic development questions and associated questions including insurance -property valuation etc. There is an increasing view among communities that Energy Co are just not interested ‘*listening but not hearing*’ – there is ‘*a made-up mindset*’ and at the end of the day they will fall back to critical infrastructure planning rights and force it through on the provisions of the NSW Land Acquisition (Just Terms Compensation) Act 1991. Energy Co appear to have adopted a policy of not having town-hall style meetings. This makes it very difficult as trust is evaporated as Energy Co try and buy off individual landowners. Landowners want a consistency of message and that is best delivered to collective communities.

Distinction Consumers and Community This brings us to our first response as to the distinction between Consumers and Communities – the IR seems, in places to reference consumers and communities as one in the same – obviously communities can also be consumers -however any targeted reforms to accelerate planning and delivery of the NE REZ will have most impact on the hosting communities. Two different but important stakeholders. It is in this context that communities will have most interface with the existing Infrastructure Planner -Energy Co. It will be noted that based on our member experience -the newly initiated Energy Co - Community Reference Groups (‘CRG’) are not working. The problem is the same as the CRG doesn’t bring any new information to the table – the Energy Co representatives can’t answer questions with meaningful answers. The concept has been drawn from the existing DPHI CCC (Community Consulting Committee) from the project planning regime and as the IR reports its ad hoc⁸. It didn’t work in the SSD⁹ context and replicating this model for transmission planning is equally as flawed. We suggest that the CRG concept be scraped -it’s just ticking the box.

Consistent with our response theme the need to Enhance Community Engagement can’t obviously be achieved by *accelerating over communities* – trust must be built by partnering in a ‘*top down -bottom up*’ approach. Working an engagement with communities that offers them guidance on governance (top down) and meaningful engagement in planning transmission outcomes (bottom up). The operative word being ‘*meaningful*’ -something that informs planning outcomes. ‘Meaningful’ is not a Consultative Committee ‘tick the box merry go round talk feast’ where Energy Co consultants can’t answer meaningful questions. An environment where the inexperience of the Government overcooks and clouds the concept of ‘our transparency hands are tied by ‘commercial in confidence.’ This is a hangover from the Environmental Planning and Assessment Act 1979 whereby DPHI do not even look under the bonnet to determine the economic viability of projects until forced to at the end of the planning process.

⁷ Section 19 (4) (b) (iii) of EII Act 2020

⁸ IR p 105

⁹ State Significant Development EPA Act 1979

Competency in Transmission Planning ; We are not going to deny that planning transmission isn't without challenges -a landscape full of high voltage transmission is not on everyone's Christmas list. However good governance and **at a minimum compliance with the EII Act** and competent management can at least mitigate the challenges. Just some examples ,which go to ToR review of current roles -particularly the activities undertaken by Energy Co¹⁰ . These are live examples from the New England of where Energy Co's competency is called into question is as follows.

1. As the ordained Infrastructure Planner how could Energy Co allow for the then Minister to declare the NE REZ with a target of 8GW without the Section 19 EII Act legislative requirement to consult local communities before declaration?
2. How could Energy Co, seemingly ignore Section 63 and Section 3 of the EII Act and not respond to the Community's concern that 8GW installed could potentially result in 1500-2000 x 280M x 6.5MW WTG. How could Energy Co ignore the Community's request to urgently conduct an **independent cumulative impact** study as communicated directly to the Energy Co Executive Director at the Armidale Golf Club in 2022 and followed up with written requests on 6 December 2022 and 16 February 2023 and verbalised in meetings with the Prime Minister in 2023 and Office of the Minister of Energy also in 2023. In public NSW Upper House Inquiries on Undergrounding (2023) and the Impact on REZ Communities (2025) . Ongoing avoidance of this issue is **not only incompetent** governance in terms of contravention of the EII Act 2020 but it's a deliberate deception of the requisite accountability that the Government promote policy that is in favour of the public interest. Over development is not in the public interest :
 - 2.1 how it competent management to cluster 4 hubs within a radius of 50klm inducing a potential cumulative impact of 800 WTG and 10 million solar panels.
 - 2.2 How is it competent management of Energy Co legislative responsibilities to ignore the lack of availability of resources -water, gravel sand , waste facilities ,housing ,density of population road access etc.
3. It is incompetent Government to ignore the objectives of the EII Act 2020 -given the considerable cost to public and community purse only to determine that an uneconomic project puts **no downward pressure** on energy prices and therefore **reduces affordability** in contravention of objectives of the EII Act 2020.
4. How does the potential for overdevelopment and stranded uneconomic assets support the Infrastructure Planner's legislative functions Section 63 of EII Act ,to **competently investigate, plan ,co-ordinate design of generation infrastructure**.¹¹ One assumes or hopes they are **not investigating** infrastructure which increases cumulative impact or that profiles as economic nonsense ?
5. How is it competent management to include in the Minister's declaration pathway **unsubstantiated EOIs** from developers -originators arising from a 2021 Energy Co reported 80 registrations of interest, totalling 34 gigawatts of potential renewable energy projects . Equally we believe that some transmission planning assumptions on NE Link corridors were made from the same unsubstantiated pool. We assume the EOI were developers with 'thought bubbles -concepts 'and not definitive project scopes. We

¹⁰ IR TOR p 11 and 12

¹¹ S 63 EII Act 2020

further assume that these broad EOI didn't contain -market plans- financial models - proprietary technology eroding competitive advantage ? This continues to be a convenient vail to deny Community probity. How is it competent to deny the Community transparent access to these EOI. **Transparency avoidance - what is Energy Co hiding?**

6. How is it **competent management** of Energy Co's legislative requirements to engage with developers as 'opaque design partners' on transmission planning. The nature of such engagement should be **open and transparent**. These are unregulated developers who may not have lodged development applications. Developers who have a clear pecuniary financial interest in transmission outcomes and hub placement.
7. More specifically as to **competent management of communications** – the Walcha Community sought an understanding as to what impact a proposed Energy Hub - allegedly 4000MW of generation wind -solar – pumped hydro had on the planned placement of the proposed South-Central Hub. The question was met with considerable evasions by Energy Co as was the community's GIPA¹² inquiry as to alleged grant funding to some elements of the energy hub thesis. **Transparency avoidance.** In addition the Walcha community has over the last 4 months sought clarification as to the size and impact of energy hub -construction -Energy Co either don't know or are avoiding basic communication on this issue.
8. How is it competent management of communication processes to avoid answers on insurance on access or fob off legitimate questions on land devaluation. How is it competent management of communications to threatenly reference -compulsory acquisition and CSSI override implications. This is the ill-advised tactics of Energy Co in the field as we speak. One wonders whether this threatening psychology permeates up into senior management thinking or worse still instructions.

In Conclusion we summarise our position in the following eight (8) points.

1. Whilst ReD4NE supports in principle any clarification and streamlining of the multiple responsibilities that result in improved competency and reduced costs to consumers - business as usual by Energy Co is unacceptable to the NE REZ Community.
2. We feel that acceleration of the Roadmap reform in the first place is what induced the lack of clarity and absence of co-ordination and accountability. We think any legislative reform should be incremental and should be conducted in parallel with the much-needed organisational re-engineering of Energy Co .
3. As to the IR's draft recommendations ReD4NE is in general agreement with enhancing engagement. In this regard we support the proposed amendments to the EII Act 2020 and it's Regulations to require Energy Co to engage with local communities affected by RNIP and PTIPs when developing recommendations. However future engagement should be managed by an **Engagement Framework Agreement (EFA)** which needs to set out in a new protocol as agreed with the NE REZ Community. **This protocol and associated EFA should be directed at the 8 competency issues we raise immediately above.**

¹² NSW [Government Information \(Public Access\) Act 2009](#)

4. We further recommend that this EFA include forecast cost benefit assumptions (FCBA) which support the design conclusions . We accept that this FCBA will not include financial detail information which may prejudice any contestability process. FCBA of course strike at legislative obligations well described above which are incumbent on Energy Co and the Government.
5. We support the establishment of both a Consumer Panel and a Community Panel. We believe this contributes to our vision of having a more progressive **top-down bottom-up agenda** as reflected in our EFA The Community Panel should as alluded to by the AEIC be on a regional basis – and should carry enough authority to influence in a ‘**meaningful way**’ the design and approval of RNIP and PTIP transmission. In other words it needs to be a senior advisory and approval body. We assume if Energy Co undertakes the Jurisdictional Planning Role envisaged and recommended by the IR then sufficient funding should flow from the AER¹³ to cover the cost of this Panel.
6. The NE REZ Community Panel should consist of community affected – and rural and regional experts who can comment on agricultural and strategic land use matters. We don’t envisage that LGA’s as ‘head noddors’ for State Government funding would be involved. The current CREG model should be scrapped or downgraded to focus on electrification CER issues -which seems to dominate the Norther CRG agenda.
7. ReD4NE supports the recruitment of more specialised resourcing and much needed capacity building and retention strategies. However we don’t support such recruitment by Energy Co on its business as usual (BAU). **BAU presents with the ongoing deterioration of competency raised in our 8 points above.** Resources must be an upgraded in accordance with an independent skills analysis including a focus on large scale infrastructure expertise and community engagement mindset.
8. In terms governance Energy Co looks on observation to be **over governed** – this is appropriate on expenditure control however it is unclear where the newly appointed Energy Co Board sits in its governance profile. The submission of Annual Report and Financial Statement – pursuant to the Government Sector Finance Act 2018 is noted.
9. In terms of costs – some transparency should be offered as to costs of **hosting Energy Co in Bond St in the CBD**. It’s services are REZ and regional – it places of operation should be in the REZ and regional -not the CBD – this sends a poor message to community and consumers.

ReD4NE is pleased to offer through these eight (8) points as it’s qualified support for the Independent Report as tabled . It is obvious from **our competency concerns** that unless dialogue is convened in the very near future, particularly on **independent cumulative impact assessment** then support will deteriorate in the New England – so we look forward to the Government’s response and we remain open to clarifying any questions or concerns the Review Team may have.

Thankyou

ReD4NE Committee Of Management

(for inquiries on behalf of ReD4NE contact– mark.fogarty@bushtricity.com.au)

¹³ Australian Energy Regulator

