

NSW Transmission planning review – submission to interim report

Dear Mr Owens,

I write this personal submission as a member of the Walcha community, a community that is about to undergo generational changes as a result of being declared within the New England Renewable Energy Zone – a declaration we knew nothing about and had no control over.

I am a local member of the Walcha community. I run a grazing business with my husband, work as a vet surgeon and I am a local Councillor. I have family and volunteer within my community. I have read and attempted to understand this 131-page review, full of industry and government terminology that I largely do not understand. As community members, that is what we must do to try to be included in this conversation. Government and industry continually fail to engage meaningfully with the impacted communities.

In response to this review, I would like to make the following comments:

Criteria 3 of the assessment criteria on page 15 is to **Improve outcomes for NSW electricity consumers, local communities and taxpayers**. It appears only large electricity consumers have been consulted on the recommendations of this review. Point c of these criteria - **facilitate effective consultation and engagement with affected stakeholders, including NSW electricity customers, local communities and Aboriginal and Torres Strait Islander people**. This review is seeking better engagement with communities as an outcome, yet the review itself has failed to consult meaningfully with communities.

Recommendation A.1 Simplify and accelerate the process for authorising REZ network infrastructure projects

Simplifying and accelerating the authorisation process without accountability will result in worse outcomes for impacted REZ communities. EnergyCo have not shown any regard for community impacts and should not be given more power unless this is addressed.

The experience in the New England REZ is that EnergyCo fail to deliver timely and complete information to communities. Communities are looking for transparency and accountability from EnergyCo. There has been no meaningful consultation with communities in EnergyCo's design process.

Improving the authorisation process of AEMO services to include community consultation and public documentation of the feedback and reasons for their decisions would improve this process for communities.

Section 4. Enhancing engagement, transparency and governance of transmission planning decisions

It appears to be the understanding of this review that EnergyCo undertake extensive consultation with communities and other affected stakeholders and that these activities inform EnergyCo's planning activities. EnergyCo do not engage with communities, they simply inform them. Social license will not be achieved without consultation, involvement and collaboration.

Community is not involved in REZ transmission infrastructure planning undertaken by EnergyCo. EnergyCo does not consider modifications to the project design proposed by community (except small adjustments). AEMO Services is responsible for authorising RNIPs but is not required to consult on these decisions or publish reasons. Where is the opportunity for input from communities – a “trusted partner”?

The draft recommendations of section 4.3 are very disappointing for communities.

Draft Recommendation C.1: Implement best-practice engagement obligations to enhance engagement with consumers and local communities and transparency of decision making.

How are the recommendations enhancing engagement with local communities? The recommendation of a consumer panel addresses engagement with consumers but has excluded any engagement with communities.

EnergyCo have demonstrated that without an enacted and defined requirement to include communities in the planning process, engagement by EnergyCo will continue to be a tokenistic, tick the box process. This will not change with these recommendations.

Genuine consultation with communities will require the establishment of either a combined Consumer and Community Panel or a separate Community Panel with similar roles as those described in the recommendations for a Consumer Panel. This was one of the options of the review but not the final recommendation. The requirement for EnergyCo and AEMO Services to consult with the Panel prior to making key decisions and the key decision makers to have regard for the reports by the Panel, would be a step towards genuine consultation and positive outcomes for impacted communities.

This would provide “**a forum for deeper engagement at the ‘involve’ or ‘collaborate’ level**”. The panel should be a consumer **and community** panel with paid community representatives as well as consumer representatives. This would give community representatives an opportunity to be involved in decision making on behalf of their communities. Communities and consumers are separate groups with different priorities and should not be confused or combined in this review. Communities should not be left out of this meaningful level of engagement. This is a missed opportunity for government to demonstrate that communities are a trusted partner and merit input.

The ongoing lip service given to communities that are experiencing generational impacts of the renewable transition is a continual frustration for communities. “Social license” can not be achieved while communities continue to be side-lined. The inclusion of communities in “the Panel” would be the only reasonable outcome of this section of the review.

Appendix A includes my personal experience of the renewable transition in our community as an illustration of the failure of communities to be recognised at any level in the renewable energy transition and the frustration faced by communities. It includes observations that are relevant to this review.

Thank you for considering my submission. I welcome any communication with the review panel.

Regards
Rachel Greig (Walcha Council Councillor)

Appendix A

There is an ongoing failure of government departments, industry, and developers to engage with impacted communities. Any engagement is to inform, not involve or collaborate or empower.

The New England REZ was formally declared in 2021. The minister is required to publish draft declarations and consider submissions prior to declaring a new REZ. I do not know of any members of our community who were aware of the intention to declare the NE REZ or the opportunity for submissions. I have asked to see the submissions and been informed that the submissions to this draft declaration are not publicly available and will not be made available. I would like to see these submissions because I believe the community was never made aware of the draft declaration and hence there are no community submissions.

The rollout of the New England REZ Network Infrastructure Project has been a classic example of DAD – Decide, Announce, Defend. Information is presented by EnergyCo after decisions have been made and plans are concrete. EnergyCo have made no attempt to involve impacted communities in the design process. Very little information was provided by EnergyCo before the Scoping Report was published (despite multiple requests for information). The scoping report was presented as a fait accompli. EnergyCo were prepared to make some small changes within properties, but the overall design was never open for discussion. Even now, EnergyCo are only sharing information on the very early stages of the REZ development. It is only in AEMO's ISP that we can see the full extent of what the state government is planning for the New England REZ.

I am a member of the New England REZ Community Reference Group. This reference group is supposed to promote two-way engagement with local communities and key stakeholders. In reality, the community reference group is a tick-the-box requirement for EnergyCo. There is no obligation to comply with recommendations of the group or to justify their decisions. There is an expectation that the group members are attending meetings, simply to be informed by EnergyCo and to disseminate this information to the wider community.

The design of the NE REZ network infrastructure project has been questioned by the community. There appears to be redundant and poorly located infrastructure based on outdated and no longer existent generator interest. Questions have been addressed to EnergyCo through community enquiries, Council enquiries and through the NE REZ CRG. There are no satisfactory answers from EnergyCo and no obligation to collaborate with the community or justify their design. Our community has been left extremely frustrated with continual exclusion from any meaningful involvement. There will be no community acceptance of projects when communities are excluded from involvement.

EnergyCo have presented to our Council once since the elections in September last year. Again, this was a presentation of the project as a concrete plan. There was no room for collaboration or negotiation. The repeated question as to why there is a 330/500kV hub in the Walcha LGA

without developer interest was not addressed. The Council's request for EnergyCo to hold a town-hall style meeting for our community was denied.

There is no continuity of engagement because of the extraordinarily high turnover of EnergyCo staff and consultants. This also results in a lack of accountability. Any sort of relationship with EnergyCo is short-lived as a result of the continually changing staff and roles.

Different plans from different government and industry agencies can be confusing and sometimes contradictory. They do fill gaps in information that are missing from EnergyCo's reporting. For example, the most recent options report (AEMO) provides information on the future transmission options within the New England REZ that has not been provided by EnergyCo. Reports by Transgrid provide discussion on options that EnergyCo are not addressing. EnergyCo do not provide all the information required for communities to understand the impacts of the full NE REZ development or even the full extent of development.

EnergyCo are not required to consult meaningfully with communities or provide feedback or justification for their decisions. AEMO services does not consult on its authorisation of projects. At what stage can communities feel they have any significant input? Where is the transparency.

This review is an example of the failure for government to include communities in their engagement. I am a member of the New England REZ CRG, I am a local Councillor, I subscribe to AEMO and EnergyCo and have written submissions to multiple inquiries and reviews. Yet I have only recently heard about this review through a community group. Communities are waiting for genuine engagement and inclusion.