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NSW Transmission Planning Review 2025

Interim Report

Submitted to

NSW Transmission Planning Review 2025

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About RE-Alliance

RE-Alliance is working to secure a responsible and rapid shift to renewable energy that actively contributes to the strength of our regions. We do this by working with and listening to the communities most impacted by renewable energy and grid projects, and facilitating collaboration across industry, government and civil society to deliver meaningful outcomes and lasting benefits for regions.

RE-Alliance has been working for over 10 years across New South Wales and other Australian states to build collaborations, lean into and learn from community and regional leaders. We work to ensure better policy from governments and better practice from industry that meet the needs, expectations and ambition of the regions. We are recognised as a leading voice on community engagement, benefit sharing and social licence.

Summary and Recommendations

We broadly support the recommendations in the Interim Report in relation to improved clarity and coordination in energy systems planning. In particular, we support recommendations to clarify EnergyCo's responsibilities, to give them a clear role and requirements in leading community engagement, to develop guidelines on how EnergyCo will perform its functions (including in relation to stakeholder consultation), and to establish a Consumer Panel. To support the current Interim Report recommendations, we suggest the following additional recommendations:

- Include a requirement for the proposed NSW System Plan to be accompanied by a plain English summary to support community engagement with the Plan.
- Recommend that EnergyCo be given the role of coordinating a whole-of-government strategy to build public understanding of and confidence in the delivery of the infrastructure upgrades required to support the shift to renewable energy.
- Recommend a process for clear linkages between the development of planning reports that consider distribution and non-network energy options and Government plans and programs designed to improve take up of behind the meter renewable energy options.
- Recommend the NSW Government support the establishment of Local Energy Hubs.
- Consult with relevant First Nations organisations to ensure that consultation and engagement requirements for First Nations peoples are culturally appropriate and fit for purpose.

The Interim Report recommendations have articulated the need for better integration between the different transmission infrastructure planning and implementation bodies, as well as the consideration of interactions between transmission, distribution and community energy resources. However, a number of associated activities which fundamentally influence how the community perceives and engages with transmission infrastructure, are missing. In preparing its final report, we recommend that the Review Panel give further consideration to:

- Mechanisms that provide clearer obligations in relation to community benefits for transmission infrastructure projects.
- Ensuring that any new NSW System Plan considers opportunities and barriers for transmission associated with:
 - Local training and employment pathways routes for renewables and transmission projects.
 - Nature and biodiversity interactions, impacts and opportunities for regional scale collaborations.
 - Workforce accommodation location and construction and related social and physical infrastructure needs, servicing and procurement.
 - Infrastructure, services and industry interactions, impacts and upgrades/ investment needs - including for water, communications, waste and road networks.

Introduction

RE-Alliance welcomes the opportunity to respond to the *NSW Transmission Planning Review 2025 Interim Report* (Interim Report). We recognise the work the Review Panel has done to consider submissions to the *NSW Transmission Planning Review 2025 Options Paper* (Options Paper), including the submission from RE-Alliance,¹ and to incorporate stakeholder feedback.

This submission builds on our submission to the Options Paper and provides some brief comments on the Interim Report, limited to those areas most relevant to community engagement in the shift to renewable energy and where we believe further consideration by the Review Panel is required.

Interim Report Recommendations

We broadly support the recommendations in the Interim Report in relation to improved clarity and coordination in energy systems planning. In particular, we strongly support recommendations to clarify EnergyCo's responsibilities, to give them a clear role and requirements in leading community engagement, to develop guidelines on how EnergyCo will perform its functions (including in relation to its stakeholders and stakeholder consultation), and to establish a Consumer Panel.

NSW System Plan

We support the recommendation to expand the current Network Infrastructure Strategy to become a NSW System Plan that consolidates information and coordinates planning of strategic projects across NSW, and to embed the requirement for this plan in legislation (Recommendation B.1). Coordinating the development and timing of the various planning reports in NSW and clarifying how they fit together to deliver an integrated plan (Recommendation B.2) will go some way in supporting stakeholders to engage with this

¹ [RE-Alliance submission to the NSW Transmission Planning Review 2025 Options Paper](#)

information. There should also be a formal requirement on the Infrastructure Planner to produce a summary version of the NSW System Plan that uses plain English to assist consumers and the broader community to better understand the strategic reasons for, direction of, and decision making around new NSW transmission infrastructure.

Recommendation: Include a requirement for the proposed NSW System Plan to be accompanied by a plain English summary to support community engagement with the Plan.

This work should be further supported by broader obligations to increase community understanding of the need for new transmission infrastructure, the rationale for which remains poorly communicated. The CSIRO ‘Australian attitudes to the energy transition’ research found that:

“Perceived benefits and the role of renewable energy infrastructure in the energy transition (the narrative) were key in predicting social acceptance of renewable energy Infrastructure... Results suggest the key role of new transmission lines as part of the energy transition (the narrative) was not well-recognised by Australians.”²

There is a clear need for a central coordination body that goes beyond engagement on specific plans and addresses this broader information gap. Under the structure recommended in the Interim Report, EnergyCo would be the appropriate body to fulfil this role.

Recommendation: Recommend that EnergyCo be given the role of coordinating a whole-of-government strategy to build public understanding of and confidence in the delivery of the infrastructure upgrades required to support the shift to renewable energy.

Non-network opportunities

We strongly support the recommendation to expand planning report processes so they are informed by comprehensive information on transmission, distribution and non-network options and the requirement for EnergyCo, as the Infrastructure Planner, to assess the relative benefits of the different options (Recommendation B.3). In our view, this recommendation shouldn’t be considered purely in the context of technical considerations about the role that distribution and non-network options can make to meet broader energy requirements. Rather, this work should complement consumer engagement programs currently being undertaken by the NSW Department of Climate Change, Energy, Environment and Water (DCCEEW) and the Federal Government to support take up of household and business renewable energy opportunities. Work should be undertaken to assist communities to understand the role they can play in an integrated energy system and, ultimately, help reduce requirements for new transmission infrastructure.

² CSIRO. April 2024. [Australian attitudes to the energy transition](#)

Recommendation: Recommend a process for clear linkages between the development of planning reports that consider distribution and non-network energy options and Government plans and programs designed to improve take up of behind the meter renewable energy options.

Engagement by EnergyCo with communities

We support the introduction of clear regulatory requirements for EnergyCo to undertake best practice engagement with local communities. These requirements should define (without limiting) likely stakeholder cohorts and clarify the expectations of EnergyCo in undertaking community engagement. Specifically, we consider that this engagement must begin before decisions about transmission route selection is made so communities have a meaningful opportunity to influence the decisions. Consultation at the stage of Environmental Impact Assessment is too late, because by this stage significant investment has already been made in a preferred route. We agree that community engagement must have clear stakeholder feedback requirements so communities can see how their input has been considered and responded to. It should be made clear that best practice engagement requirements must apply to all transmission projects and parties - both contestable and non-contestable.

As noted above, we also support the development of a Consumer Panel. The Review Panel's final report would benefit from providing further detail regarding the points at which the Consumer Panel must be consulted, how their input will be considered and responded to at each point, and processes required to ensure that the Consumer Panel has access to the necessary data or other information to inform its deliberations, for example data access rights with confidentiality protections.

While the recommendations on stakeholder engagement should improve community consultation on transmission infrastructure, it may not be sufficient to address the current issues experienced by communities of being consulted with by multiple entities in relation to different but related aspects of the shift to renewable energy. As we noted in our submission to the Options Paper, communities need to be able to access a single source of information, such as through the establishment of Local Energy Hubs. Local Energy Hubs would provide services to support communities in understanding and participating in the shift to renewable energy. Local Energy Hubs would complement EnergyCo's existing regional office locations and outreach, but would be staffed by respected local people with strong community connections, independent from industry. The Local Energy Hub staff could be crucial touchpoints for transmission infrastructure planners, renewable energy developers, and governments, playing a key local role helping to foster trust in communities for their projects through quality communication and engagement. They would also address barriers to accessing general information on renewables, household electrification, and tackle complex challenges like ensuring community input on large-scale projects proposed for their regions. Local Energy Hubs would also help to close the current gap in community consultation processes by providing a single point of information, until the proposed new regulations and consultation arrangements are given effect.

Recommendation: Recommend the NSW Government support the establishment of Local Energy Hubs.

While it should be inherently captured by the requirement to implement best-practice engagement obligations, we are concerned that there is limited discussion in the Interim Report on First Nations engagement. We note that First Nations organisations do not appear to have been directly consulted as part of the Review Panel's work to date. The Interim Report's primary recommendations in relation to First Nations engagement appears to be changing where in the authorisation process that the First Nations Guidelines are required to be considered and recognising First Nations peoples as a stakeholder that must be consulted by EnergyCo. As we stated in our submission on the Options Paper, in our discussions with First Nations groups and advocacy organisations it is clear that the current First Nations Guidelines do not ensure adequate First Nations engagement in transmission. We reiterate our previous recommendation that the Review Panel consult bodies like the First Nations Clean Energy Network on ensuring First Nations engagement in energy systems planning and implementation is appropriate and sufficient.

Recommendation: Consult with relevant First Nations organisations to ensure that consultation and engagement requirements for First Nations peoples are culturally appropriate and fit for purpose.

Additional Recommendations

Community benefit sharing

As we noted in our submission to the Options Paper, the NSW Transmission Review should support the NSW Government's commitment to enhance and coordinate community benefit sharing by making clear recommendations that will ensure that the future planning framework delivers improvements in community benefit sharing. The *National Guidelines: Community engagement and benefits for electricity transmission projects*³ could be more positively and proactively referenced for transmission planning and development activities. At a minimum, transmission delivery bodies should engage and collaborate with affected communities and councils along the route-path and align benefit sharing initiatives to respond to those identified needs and engage in discussion around local training and employment pathways for transmission projects. Transmission benefit sharing under the NSW Renewable Energy Framework currently appears to be optional. Mandated benefit sharing should adopt a strategic approach to supporting local communities, and enabling local input to inform what is prioritised in a region. In addition to benefit sharing, there should be a clear policy to guide appropriate payment arrangements for near neighbours as well as (the existing) landholder payments framework.

Recommendation: Identify mechanisms that provide clearer obligations in relation to community benefits for transmission infrastructure projects.

³ [National guidelines: Community engagement and benefits for electricity transmission projects](#)

Associated activities

While often seen by infrastructure planners as separate issues, from a community perspective issues associated with environmental impacts, workforce accommodation and associated infrastructure and services all act together to contribute to the cumulative impacts of new transmission and renewable energy development in a region. Requiring that these issues are considered as part of systems wide planning for transmission infrastructure is important. We refer the Review Panel to our submission on the Options Paper for further information on this issue and recommend greater consideration of this issue in the Review Panel's final report.

Recommendation: Ensure that any new NSW System Plan considers:

- **Local training and employment pathways routes for renewables and transmission projects.**
- **Nature and biodiversity interactions, impacts and opportunities for regional scale collaborations.**
- **Workforce accommodation location and construction and related social and physical infrastructure needs, servicing and procurement.**
- **Infrastructure, services and industry interactions, impacts and upgrades/ investment needs - including for water, communications, waste and road networks.**

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