

From: Keith Mc (*Redacted for privacy*)
Sent: Wednesday, 6 November 2024 1:26 PM
To: Licence Query Info (ESC)
Subject: TCV licence submission

Essential Services Commission

Level 8, 570 Bourke Street

Melbourne Victoria 3000

Via email: licences@esc.vic.gov.au

Dear Essential Services Commission (ESC)

Thank you for the opportunity to provide feedback to Transmission Company Victoria (TCV) application for a transmission licence and the following is my submission.

I am a Landholder within the current preferred route for the planned transmission lines known as VNI West, as such I have had some dealings with AEMO and TCV.

The relationship did not start well as my first communication to TCV was to make privacy complaint.

The complaint was sent by email 1 September 2023, following this I receive a phone call from (*Redacted for privacy*) (Project Director) who was more interested in placating my concerns rather than addressing the matter at hand being the breach of privacy and their process of piece meal release of privileged and sensitive information. From our discussion I doubted he had actually read my complaint. Part of the resolution to my complaint was to receive an apology; sadly even this could not be achieved, as in this next correspondence received from TCV signed by (*Redacted for privacy*) (4 September 23) acknowledged our discussion but included no apology. The matter has never been mentioned again by TCV.

From TCV actions since it would seem that they have not refined their practices of informing landholders and is still piece meal and leaves it open to a number of privacy issues.

I do not wish to re-prosecute my TCV complaint with the ESC however for clarity it was genuine and involved TCV, revealing details of my property with my neighbour of their privileged information not yet made public or to myself.

Following guidelines is also something from my experience that TCV has not much regard for as in their "Respectful engagement: Our commitment to the community" to which they fail on many dot points such as making first contact by phone, meeting on my terms of time and location and from above take all complaints seriously.

The conflict of interest brought about by the TCV structure is most concerning and unnecessary; it is incumbent on TCV to structure itself without the partnering of others that create a conflict of interest. The concept that the AEMO/ TCV as Market Operator and Victorian transmission

network planner could also be the builder and operator of a transmission line without causing conflict. This would be impossible to manage with proper oversight from the ESC and the AER.

While TCV may play down these concerns with words the reality the risk is too high to allow TCV to have a transmission licence.

While it is envisaged by the licence application that AEMO will divest its interest with TCV and be 100% sold to an unknown third party there will remain the support structure and consultancy from AEMO that will still cause a conflict of interest. To highlight this, the registration of TCV as a Network Service Provider with AEMO as the licencing authority, it is just not possible to consider this as a proper process and would be seen as an unethical preferential treatment.

The concept of AEMO through to transmission operator being interconnected through partnerships and or consultancy involving both private and public parties is untenable in the regulated in energy industry. The vertical integration of Market Operator, Victorian planner, builder and operator would be open to manipulation and lack transparency, this making the job of the ESC and AER to achieve proper oversight and lead to the electricity consumer being taken advantage of through increased prices.

The Structure as mentioned earlier is problematic and should have been addressed prior to making its application for a transmission licence, with the advent of the sale of TCV likely to be in early 2025 it is perplexing as to why TCV are applying for a transmission licence at this time. Indeed it is possible that we could see a transmission licence granted one week to only see the owner and structure of TCV change the following week this is a failure of TCV to present the transmission licence application with a proper structure in place, at this stage TCV is more of a vision than a fully operating stand-alone company.

This has led to the allegation that AEMO are through TCV really only seeking the land access rights that are enabled with a transmission licence, and is largely confirmed by the threatening language seen in TCV publications, if so this would be seen by many to be a breach of process. Time will tell if this perception held by many is to come to fruition, this is a risk that ESC need to aware of.

Expertise in building is something that TCV simple do not have and is not something that can be simple acquired from third parties without deep knowledge and experience in gaining value for money. Failure to cost large projects has been a feature of AEMO, examples such a HumeLink in 2018 costing \$0.9bn to \$4.98bn in 2024 this sort escalation of cost seems to be the norm from AEMO which is where TCV is said to draw its expertise from. Once again it is the electricity consumer that will have to pay for such cost overruns.

In Summary this application from TCV is unworthy on grounds of poor prior performance, inappropriate structure, lack expertise and above all else lead to increased costs flowing over into increased prices for electricity consumers. The application should be rejected!

Yours Sincerely

Keith McPherson

(Redacted for privacy)