

From: (Redacted for privacy)
Sent: Tuesday, 5 November 2024 9:42 AM
To: Licence Query Info (ESC)
Subject: TCV License submission.

As landowner adjacent to VNI West I feel compelled to oppose the awarding of a transmission licence to TCV (AEMO). I believe TCV is an unfit entity to hold such a licence because of its brief existence, an awful engagement process with the affected communities and the conflicted nature of parent company AEMO acting as a government mandated operator of the NEM as well as the Victorian Transmission system.

TCV is a subsidiary of AEMO with two fully paid shares, two sole directors being the CEO of AEMO and another senior executive of the same company. TCV was registered with ASIC on the 24th February 2023.

This is a full year after the VNI West transmission route was announced and shows the ad hoc nature of the planning that AEMO has instituted in the 'fast tracking' of transmission builds.

In reality, the ESC will be granting a licence to AEMO which raises questions into transparency and the proper distancing of a government mandated entity from direct involvement in the commercial sector.

AEMO has extraordinary powers in its operation of the NEM and also as the overall manager of the Victorian grid. AEMO can and does directly intervene in pricing and grid operation.

It should be noted that the Federal Government intends to task AEMO with the Capacity Investment Scheme, this clearly adds to my concern over an agency that has expanded exponentially in both funds managed and responsibilities as dictated by government. The "catch all" nature of the organisation and its subsidiary parts requires far more oversight into operational matters than is currently happening.

The structure of AEMO raises serious issues into its responsibilities in the development of transmission in Victoria arising from the ISP. AEMO states that it is a not for profit membership company and yet its existence is entirely at the behest of the federal and state governments, who have an overall controlling interest.

It is my belief that the community would expect such an entity to be non-commercial and distance itself from on ground works or from using funds levied through governmental powers in commercial transactions associated with transmission builds. It is entirely possible to contend that TCV was set up as a vehicle by AEMO to distance itself from the actions undertaken by TCV in the development of the VNI WEST project.

TCV has shown from its very first attempts to communicate with landowners, a disorganised and confused structure that led directly to misleading information being put in the public arena. Their first flyer featured pictures of farms and transmission towers from some Eastern European country as they had outsourced their media material to an outside party. The same flyer contained references to powers of acquisition of land under Victorian statute that they should not use as it gave the false impression that TCV could exercise those powers as a last resort. The ESC was contacted by landowners who noticed this overstep and thankfully the ESC asked that TCV remove the reference.

The very name 'Transmission Company Victoria' is misleading and I believe this to be deliberate. They are not a transmission company in any commercial or structural sense and yet chose this company name before they obtained any transmission assets or licence powers from the state. I believe this name was chosen to confuse poorly informed landholders into thinking they were dealing with a government agency or department and not a subsidiary AEMO. TCV and its parent work in a very niche zone where they implement government policy but avoid the structural responsibilities of departments or legislated statutory authorities. I note that due to its private company structure, FOI requests are not able to be used to open up transparency for the public into the decisions and planning that will impact greatly on the community they target for the transmission line builds.

Most concerning is the stated plan for TCV to be acquired or sold to the successful tenderer for the VNI West project. How does it pass the "pub test" for a TCV to be sold by AEMO to a private company or consortium?

Its value would be greatly enhanced by the possession of transmission licence and I suspect that fact underpins this application. You could reasonably ask why the ESC should grant this licence to TCV when the successful tenderer most likely be a transmission company and a holder of an existing licence and/or quite well equipped to seek a licence for the transmission inter-connector build in its own right.

Fast tracking of transmission line build by the Victorian Government has led TCV to sloppy and rushed management decisions. I believe that this licence application is another example of this rush in the hope that a successful outcome would truncate the timelines for the commencement of the build stated to start in 2026. A 500,000 volt structure should not be put into a 'fast track' category and hope to retain public confidence into the safety or even the necessity of the project.

The fast tracking has also resulted in very pushy behaviour by TCV staff in trying to achieve timelines and a roll on at any cost attitude. Many people complain of constant and unsolicited contact from TCV liaison staff and some find this harassing in nature. We have seen constant staff turnover in TCV and I believe this is testament to the highly unpleasant nature of the work they are asked to undertake. Many landowners along the proposed route have clearly expressed they want no further contact with TCV.

A map that supports this refusal will be made available in other submissions to the ESC.

TCV has achieved the dubious result of alienating the natural goodwill of the rural landholder community, who represent over 140km of the properties under the proposed 75 metre easement, within the space of a year. Promising to do better does not cut it anymore and the opposing landowners are set to contest every stage of consultation or negotiation with TCV. The huge expenditure by TCV on self-serving advertising is a further annoyance to landowners whose own experience belies the soothing tone and the “its all going well’ nature of these public notices. An organisation that cannot be honest in communication is not fit to hold a transmission licence.

I note with disgust the use of paid security by TCV and the calling of police to attend meetings and organised events. While tempers may be aroused there has never been any need for such security at these events and it is a great insult to the rural community to have these tactics used to colour opposing voices as some form of threat to TCV staff. Our rural community is hard working and honest, though more elderly than most communities, and deserve respect. I have chaired and organised many rural community events and meetings in my life but have never seen the need to have security present no matter how robustly opinions are stated. Black clothed young men should not be greeting eighty year old grandmothers at the door of TCV meetings!

I strongly urge the ESC not to grant a licence to TCV and instead set up a dialogue with AEMO to develop a more suitable community engagement path that is hands off from their organisation and set up a collaborative model as opposed to a ‘top down’ imposition style that has to this point been mostly counterproductive to the aims of energy transition.

Regards,

Gerald Feeny

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