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(Redacted for privacy)

6th November 2024

Essential Services Commission

Level 37, 2 Lonsdale Street
Melbourne, VIC 3000
Australia

Dear Sir/Madam,

Re: Submission Regarding Transmission Company Victoria's (TCV) Application for a Transmission Licence for the VNI West Project

We submit this response to Transmission Company Victoria's (TCV) application to the Essential Services Commission for a transmission licence for the VNI West project, a proposal that has significant serious consequences for landholders, communities, and consumers, especially those in rural and regional areas. As a landholder directly affected by the proposed transmission line, I must emphasise the significant concerns that have arisen through TCV's engagement with affected parties and the broader implications of the project.

1. Lack of Meaningful Consultation and Engagement

TCV has conducted limited engagement with landholders along the proposed VNI West route. These consultations have been insufficient and, in many cases, unprofessional. The frequency and quality of engagement has been inadequate, especially given the magnitude of the project. At the outset, we were informed of consultations, but these efforts have often been poorly executed. On several occasions, we attended community meetings only for TCV representatives to either fail to show up or be unable to answer any of the critical questions raised by landholders and concerned members of the community.

This insufficient level of engagement has not only wasted valuable time for landholders, but it has also contributed to a sense of frustration and distrust. Furthermore, landholders, including ourselves, are not compensated for the considerable time and resources we invest in these consultations, while TCV staff are remunerated for their time, yet still fail to provide meaningful or useful information.

2. Harassment and Threats

There have been multiple instances of TCV representatives engaging in inappropriate and aggressive behaviour towards landholders. We have been explicitly threatened with the loss of compensation if we do not sign land access agreements or if we refuse to comply with the demands of TCV. On multiple occasions, TCV staff have falsely claimed that our neighbours have already signed agreements, a claim that has later been proven to be untrue. Furthermore, my elderly neighbour was harassed by TCV staff despite explicit instructions that they should not be contacted alone.

The coercive tactics employed by TCV, including threats of compulsory acquisition, have created an environment of fear and uncertainty. It is deeply concerning that TCV has neglected to ensure that landholders fully understand their rights, particularly in relation to compulsory acquisition and the potential for reduced compensation should the project move forward.

3. Failure to Address Landholder and Community Concerns

The failure of TCV to address critical issues related to farming operations, mental health impacts, and overall community wellbeing is alarming. Landholders, especially those of us in rural and regional areas, are deeply concerned about how the VNI West project will affect our livelihoods. We have repeatedly raised urgent questions regarding potential risks to our farming businesses, including

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increased fire risk and the impact on agricultural practices, such as spraying and livestock access to transmission infrastructure. These questions have been ignored or met with evasive, vague responses, with one TCV representative claiming they did not have access to the relevant information.

This lack of transparency is particularly concerning given the significant impact this project could have on our agricultural businesses, livelihoods, and mental health. Rural and regional communities experience a higher rate of suicide and mental health struggles compared to the general population, and when questioned about this, TCV provided the phone numbers to Lifeline and Beyond Blue. This dismissive approach falls drastically short of best practice for engaging with vulnerable communities at risk. Despite huge investment in a Productivity Commission Mental Health Inquiry Report, a Royal Commission into Victoria's Mental Health System, and most recently the release of the Victorian suicide prevention and response strategy 2024-2034, the lack of genuine understanding and consideration of the impact of this project on communities and individuals has been astounding. TCV has failed to take any substantive action to address these critical challenges in its consultation process.

4. Environmental, Social, and Economic Impacts

The VNI West project, as part of an ambitious energy transition to a 100% renewable system, will undoubtedly have far-reaching social, environmental, and economic consequences. The push towards renewable energy sources, comes with considerable challenges related to the scalability of such systems, the economic burden they place on consumers, and the environmental costs associated with large-scale infrastructure projects.

There are numerous examples globally where renewable energy transitions have resulted in increased grid costs. For example, in Germany, the costs associated with wind energy rose by 60% when it contributed 20% of the country's electricity and by 100% when it reached 40%. This is concerning for consumers in Victoria, as the VNI West transmission project is expected to increase electricity prices, putting additional financial pressure on both consumers and businesses. The rising costs of renewable projects, coupled with the volatility of energy markets, further highlight the risks involved with the proposed expansion of the electricity grid to include such a huge number of renewable energy infrastructure projects.

Further to this, the costings completed on the projects and processes associated with transitioning to a energy system powered by renewables have not taken into account the entire system infrastructure required to fully transition to renewable energy. The ultimate cost of this transition including the cost of projects like TCV's VNI West project, will be passed to consumers, increasing the cost of electricity and destabilising the energy grid.

5. Concerns About the Transmission System's Impact on Agriculture

The potential impact of high-voltage transmission lines on farming operations has not been adequately assessed or even considered by TCV. The introduction of 500kV lines poses significant impacts on agricultural practices, including the use of agricultural spraying, grazing of livestock near power infrastructure, and the overall impact on land productivity. Furthermore, the safety risks associated with high-voltage transmission lines, particularly in terms of increased bushfire risk, has been completely overlooked. Overhead powerlines have been identified as a source of bushfires, and the VNI West project will exacerbate this risk across large parts of rural Victoria.

Additionally, the visual and auditory impact of such a large-scale infrastructure project cannot be ignored. Transmission lines are visually disruptive and create significant noise, which can affect both the mental wellbeing of nearby residents and the operational efficiency of agricultural businesses.

6. Lack of Transparency Regarding Project Ownership and Future Development

It has been widely reported that TCV intends to sell the VNI West project to a third party once the transmission licence is granted. This creates significant uncertainty for affected landholders, who are left without a clear understanding of who will be responsible for future consultations or addressing ongoing issues. If TCV is allowed to sell the project, the ability to meet regulatory obligations and ensure effective community engagement and support is severely diminished.

7. Conclusion

Based on the current engagement practices, the lack of meaningful consultation, the threats of compulsory acquisition, and the failure to adequately address the serious concerns of landholders and local communities, we do not believe that TCV has demonstrated it is a fit and proper entity to hold a

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transmission licence for the VNI West project.

Landholders and communities have been treated with blatant disregard and disrespect throughout this process. There has been a failure to address critical issues related to the environmental, social, and economic impacts of the project, particularly the effects on rural and regional communities, agricultural practices, and mental health. TCV has not engaged in good faith with landholders and has not sought to gain the social licence required to move forward with such a significant project.

I strongly urge the Essential Services Commission to carefully consider the concerns raised in this submission and the broader implications of granting a transmission licence to TCV for the VNI West project. TCV has not demonstrated sufficient accountability or transparency, and the impacts of this project on landholders, consumers, and communities must be carefully evaluated before proceeding. The lack of transparency, accountability, and respect shown by TCV is a clear indication that this project's impact on landholders, consumers, and communities warrants thorough evaluation before any licence is granted.

Sincerely,

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