

Submission re: Transmission Company Victoria's (TCV) application for a Transmission Company Licence (TCL)

Most questions are drop-down boxes except for these questions:

What effect on electricity pricing do you think TCV's VNI West project will have?

It will increase the cost of electricity for Victorians because:

- The most direct and therefore shortest route for the transmission line has not been chosen and will require more infrastructure than first thought as the line meanders around the state. This increased cost will be passed onto consumers.
- Renewable energy projects are being built further away from transmission infrastructure so the cost of connecting to the grid is increasing, which consumers will pay for through their power bills, especially as transmission lines are kept away from the voter population of Melbourne and regional areas.
- It has been shown that AEMO the company that created TCV to progress the VNI West project has prepared a GenCost report described as dubious at best along with an ISP that does not include the full cost of the project nor a "whole system plan" as claimed. Aidan Morrison, Director of Energy Research (CIS), has researched this and his work is endorsed by the CSIRO. This is a concern that must be addressed.
- As the current Victorian Government rushes to reach a renewable energy output of 82% by 2030, how can we be sure what limits have been put on subsidies that will be paid to wind and solar companies linked closely with VNI West? Which again, will be passed onto the consumer through their electricity bill.
- TCV has stated that the company will be sold off to an unknown buyer before construction begins, what unknown costs will the consumer have to bear?
- When renewable energy fails to provide consistent electricity Victorians will incur the cost of reverting to coal/gas or be required to compensate industries, who are paid to shut down, for loss of productivity.

What are your views on TCV's ability to comply with its regulatory obligations?

We have grave concerns about TCV's ability to comply because:

- The objectivity of consultation is uncertain, especially when it comes to preparing EES and the like. Will TVC be accountable to the Victorian taxpayer through independent consultation or will TCV beholden to wind and solar companies like Westwind who use their own consultants to achieve the results they want.
- The political ambition of the Victorian Government to reach 82% renewable energy output by 2030 places pressure for reckless and hasty decision making to meet these targets and place undue pressure on landholders, such as the threat of court action, to reach their goals.
- Landholders' rights to appeal decisions at VCAT will be limited or removed and TCV will use this unfairly to their advantage through compulsory acquisition.
- We are not assured that the money being generated for the Government from the easement tax (\$177 thousand for every kilometre) will not result in undue pressure exerted on landholders, including being threatened with compulsory acquisition of land as well as being used as a scapegoat for the current state of Victoria's energy supply.

Is there anything else you think we should consider as we assess TCV's electricity transmission licence application?

We demand that you investigate:

- The overt conflict of interest if TCV is both the operator and the regulator. Who then regulates the regulator?
- TCV's links to wind and solar companies and ensure subsidies paid to them do not take precedence over the promise of "cheap" electricity to Victorians.
- Using the most direct route to connect Melbourne and the Snowy Hydro system.
- Why do 1% of Victoria have to carry 100% of the renewable energy load and what other energy options are under investigation e.g., rooftop solar installations on all rooftops in cities?
- The responsibility of citizens in the city to share the load in hosting transmission and renewable energy infrastructure.
- TCV's application for a TCL is not an underhanded way to gain statutory power to compulsorily access and acquire properties for the VNI West project, taking away the right of the landholder to have a say about what occurs on their land.
- That TCV will not use their power to unfairly threaten or intimidate landholders to agree with "hosting" the project. Already landholders along the current easement are being told they jeopardize Victoria's energy supply, which is abhorrent. Securing energy supplies is the Governments and plans should have been made decades ago, not in the last few years.
- That there is a recourse for landholders to appeal any attempts by TCV to compulsorily acquire their land.
- If 1% of the population is forced to carry 100% of the transmission burden and their land is compulsorily acquired, then the landholder will receive compensation that is comparable to the money being made by the Victorian Government through the easement tax of \$177 thousand per km, subsidies received by the companies constructing the transmission line as well and/or the wind and solar companies set to benefit and not the pittance of \$8 000 per kilometre which is currently on offer.
- The validity of AEMO's GenCost Report and ISP must be investigated.
- Which company will TCV be sold to & the burden will they place on the Victorian taxpayer/energy consumer?
- The impact on Victoria's agricultural industry, especially as the Paris Agreement states that food production must remain a priority and not sacrificed to reach net zero carbon targets.