

27 September 2023

Ms Anna Collyer  
Chairperson  
Australian Energy Market Commission  
Lodged on AEMC website

Dear Ms Collyer,

**Response to *Enhancing community engagement in transmission building - draft Determination***

The Clean Energy Investor Group (CEIG) welcomes the opportunity to provide feedback on the Australian Energy Market Commission (AEMC)'s *Enhancing community engagement in transmission building - draft Determination* (the draft Determination) published on 10 August 2023.

CEIG represents domestic and global renewable energy developers and investors, with more than 16GW of installed renewable energy capacity across more than 76 power stations and a combined portfolio value of around \$38 billion. CEIG members' project pipeline is estimated to be more than 46GW across Australia. CEIG strongly advocates for an efficient transition to a clean energy system from the perspective of the stakeholders who will provide the low-cost capital needed to achieve it.

**KEY POINTS**

- CEIG is supportive of the proposed rule change, its fast-tracked review and its prompt implementation in December 2023.
- Proactive and broad consultation with stakeholders can help to flag and mitigate issues early, avoiding future delays and higher costs.
- In addition to the AEMC's proposed stakeholder list, CEIG supports adding:
  - representatives of local industry, local business groups and/or local large energy users (to help factor in future local business developments);
  - representatives of conservation/ biodiversity expert groups (to help factor in concerns around biodiversity and cumulative landscape impacts)
  - this should include marine experts for offshore transmission developments.



- CEIG supports extending the application of the new rule:
  - to all transmission projects;
  - to any transmission project developer (for cases where the TNSP is not the developer);
  - to both onshore and offshore transmission projects.
  - wherever possible, to any projects that are already underway and projects which are receiving taxpayer funds.
- CEIG supports setting minimum expectations for how community engagement should be conducted and supports the AEMC's proposal.

### **GENERAL COMMENTS**

CEIG is supportive of the proposed rule change, its fast-tracked review and its prompt implementation in December 2023.

It is critically important for the energy transition that Transmission Network Service Providers (TNSPs) obtain and maintain social licence for their projects with local communities including First Nations people.

CEIG agrees with the AEMC that

*“Increased certainty and consistency in the National Electricity Rules around TNSPs’ early engagement with communities, leads to better outcomes through more proactive and constructive relationships with local communities.”*

### **DEFINITION OF WHO SHOULD BE CONSULTED**

Proactive and broad consultation with stakeholders can help to flag and mitigate issues early, avoiding future delays and higher costs. The VNI West project is a key example of lack of early and broad consultation by the TNSP creating delays and higher costs that consumers will ultimately bear.

As such, in addition to the AEMC's proposed stakeholders listed in table 3.1, CEIG supports a broader list of stakeholders being consulted including:

- representatives of local industry, local business groups and/or local large energy users;
  - this should help to factor in future local business developments including those that could benefit from the new transmission infrastructure;
- representatives of conservation/ biodiversity expert groups:
  - this should help to factor in concerns around biodiversity and cumulative landscape impacts;
  - this should include marine experts for offshore transmission developments;
  - it should also complement the work of governments around biodiversity mapping (and fill that gap until that work is complete)

- CEIG notes that environmental groups are listed as stakeholder groups to be consulted in the Australian Energy Infrastructure Commissioner's *2023 Community Engagement Review*.

**APPLICATION OF THE NEW RULE**

The AEMC proposes that the rule applies to

*"(...) actionable ISP project, future ISP project, or project within a REZ stage (...)"*

CEIG supports extending the application of the new rule to all transmission projects. The new rule establishes good practices for community consultation that should be applied to all transmission projects, regardless of their 'AEMO status'.

The AEMC proposes that the rule applies to TNSPs. CEIG supports extending the definition of the entities the rule applies to to include any transmission project developer (to account for cases where the TNSP is not the developer).

It should also be clear that the rule applies to both onshore and offshore transmission projects.

Finally, wherever possible, the new rule should be applied to any projects that are already underway and projects which are receiving taxpayer funds (e.g. Rewiring the Nation funds).

**SUPPORT FOR SETTING MINIMUM EXPECTATIONS FOR ENGAGEMENT**

CEIG supports setting minimum expectations for how community engagement should be conducted and supports the AEMC's proposal.

CEIG thanks the AEMC for the opportunity to provide feedback on its draft Determination and looks forward to continued engagement on those issues. Our Policy Director Ms. Marilyne Crestias can be contacted at [marilyne.crestias@ceig.org.au](mailto:marilyne.crestias@ceig.org.au) if you would like to further discuss any elements of this submission.

Yours sincerely,



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