

Hi,

I'd like to voice my opinion regarding the ISP which appears to unfairly burden consumers with costs that aren't transparently accounted for.

1. The complete omission of any costs of Consumer Energy Resources (household batteries, solar panels, etc). How can AEMO argue that it is modelling "whole of system costs" or acting in consumer's best interests when millions to billions of dollars are unaccounted for. This is highlighted where the ISP assumes these resources are "coordinated" by the grid - if the system relies on my household battery to function then my household battery should be factored in the costs. A large drive for household battery installation will be due to the expected rebates being rolled out this year. Considering rebates are paid via taxpayer money this is effectively another hidden cost on consumers not accounted for.
2. The current modelling appears to be extremely over-fitted to weather data and patterns. There is no resilience for unpredictable weather events or factors to account for this uncertainty. Just this past summer of 2023-24, we have an easy example of the modelling being totally incorrect. BOM raised alarm bells about drought and heat and yet we were smashed with rain in Queensland almost 3-4x the expected average. The modelling also contains ridiculous assumptions where gigawatts of gas capacity can be built and retired around 2044-55 for extreme El Nino or La Nina weather events.
3. The modelled over-sensitivity to weather events and cherry picking of construction timelines to promote the rush of transmission infrastructure (which consumers bear the burden of costs) is unfair and makes a mockery of all the arguments made to support the staged approach. HumeLink should be modelled at the time the Feedback Loop notice was approved.
4. Why is there not serious modelling for the "do-nothing" baseline. Without a fair control scenario how can AEMO claim the ISP fairly calculates energy transition costs. All scenarios currently demand every carbon target and renewables target is met, the ISP can't evaluate the actual cost of those targets. AEMO dropped the Slow Change scenario in the previous IASR which was the closest thing we had to evaluate this cost. Let's not even get into the fact that it was unfairly dropped when a majority of stakeholders wanted it retained for this very reason, most importantly the consumer stakeholders which AEMO apparently does not care about.

Kind regards,
Jack Horig