

Submission to AEMO on the *Draft 2025 Inputs, Assumptions and Scenarios Report Stage 2* (IASR).

21 March 2025

This is my second submission in relation to the IASR and the underlying thrust is quite similar - around the ineffectiveness of the community expectations rules and clauses

Unfortunately, it seems community engagement has no part to play in stage 2 as there are no *Matters for consideration for Stage 2* that relate. Not only that, it appears that any submissions about related items in Stage 1 didn't have any effect. This is a cause for concern and in a way the subject of this submission.

In this submission I have decided to respond more generally about the flawed approach being followed in relation to community engagement, but also use the specific questions raised in the IASR Report Stage 1 as examples.

Specifically, I want to comment on the IASR Stage 1 sections headed:

- Land use penalty factors in REZs allow for increases in resource limits
- Social licence

Before I get on to specific comments, I think it must be said that the IASR, and in the end the Integrated System Plan (ISP) as well, really downplay the significance of community engagement. This is a deep flaw in the whole ISP process. It seems to be a question of statistical significance. The number of people directly working on the energy transition must be many tens of thousands, possibly even another order of magnitude. The recent IASR webinar is probably a guide, with over 200 participants and behind them at least 100 more people each would be a conservative estimate. But the number of people deeply affected where the energy transition is really happening is relatively small.

As the CSIRO *Australian attitudes toward the energy transition* report clearly shows, people accept renewable energy infrastructure - until it's them that is affected. The summary and overall representation of that report just overlooks the statistically insignificant. Try running the same survey along the HumeLink, WRL or VNI West corridors or across the neighbours to wind generation or battery facilities. I'm pretty sure you'll get a many sigma difference. I think we know that most people are supportive of the energy transition, so get past that and now design a fair and equitable approach.

Not only is the number of people deeply affected relatively small, they also have practically no representation in the ISP process – unfortunately their only interaction comes as a

consequence of the ISP. What's happened to the Consumer and Community Reference Group and did they achieve anything?

In regards the "upper land use limit" and "land use penalty factor". For me, that section highlights the deep flaw in the Integrated System Plan (ISP). Listening on the webinar it is very impressive the level of detail that has gone into the report, quite incredible actually the nuances that have been considered. But, in relation to community engagement and land use parameters, there is no detail. The amount of effort that has been put into these is clearly very low. Here, the lack of granularity in the report is as equally astounding as the detail in other areas.

The 5% land use limit itself also highlights this very well. The actual situation on the ground is that some land has 100% use and catastrophic impact, while not far away there is 0% use, but perhaps still quite high impact. This is where averages and medians don't work. **These situations warrant individual, focussed and detailed responses.** I'm sure the 5% fits nicely into a single Excel spreadsheet column but it **does absolutely nothing to implement a fair and equitable REZ.**

Rather than individually comment on more of the listed considerations I want to use them to provide specific feedback about why the process is flawed.

The *Breakout box 1 – Actions in the Energy Ministers' response* is clearly, perhaps even cleverly, designed to **supress community engagement**. The direction to take notice of community sentiment is admirable, but the statement "from CSIRO surveys or as the result of Transmission Network Service Providers' community engagement" **is appalling**. There is far too much connection between AEMO and the TNSPs. I don't think many, if any, people on the webinar would realise the range of tactics used by the TNSPs to supress community sentiment. Their engagement advice into this process is fatally wounded. But regardless of any examples of bad behaviour, it is only common sense that TNSPs should not be trusted. It's pretty basic policy not to trust anyone with a vested interest, which is why I say that breakout box direction is clearly going to **inject false narrative into this planning process**.

This is the essence of the deep flaw. No one is trying to solve the issues faced by the minority of people who are harshly affected. Yes, there are difficult issues - how do you resolve a situation where one landholder agrees to wind generation but the neighbours don't? This seems intractable, but I don't believe that, it's just that the same level of effort hasn't been applied. All the many are more interested in CO₂, MW and \$.

One of the prominent AEMO paragraphs is about engaging early, but the painful reality is the complete opposite. I am in Victoria near the proposed VNI West project, so my comments are closely related to that, but as a consequence of the VNI West proposal, the area is being bombarded with foreign companies cold calling, driving around taking photos and planning for wind and solar facilities as well as feeder lines – **that's before anyone local has even been spoken to**. So much for the NEM/ISP/AEMO recommendations around early community

engagement. The lack of success, or dare I say compliance, with this objective **must be addressed**. I use the word compliance deliberately because I think part of the solution is stronger rules.

The lack of early engagement has led to a complete lack of trust. I think any renewable energy organisation, private or public, should be compelled to **go public as the first step**. At the moment, wind, solar and battery generation projects suddenly appear after negotiations with landholders. Transmission is orders of magnitude worse – the community are told it's a done deal from the moment it's announced. While energy companies will be against this, it would go some way to meeting a very important indicator.

I will also reiterate from my first submission, federation is a problem, someone needs to take charge. Issues like compensation are just an absolute debacle, **there is no semblance of fairness and equity**. Of course it's related to what I have said previously, there needs to be a focus on the small number of difficult problems.

Community engagement and the treatment of impacts needs much, much more consideration and detail. At the moment these are still afterthoughts. The current approach certainly seems a long way from that stated in the strategic corporate plan, including "Embed a more consumer-focused mindset in AEMO's decision-making".

AEMO should solve these difficult problems, but the bottom line is they don't have to. It's clear from the VNI West community reference meetings that the lowest common denominator is the only way forward that is being considered.

My apologies for not remaining focussed, I did have suggestions around the other dot points such as forecasting and planning, sensitivity analysis and so on, but I feel that this would somehow endorse the current approach when the current approach is not addressing the real and difficult issues.

My simple summary is that this whole process needs to be guided and measured against fairness and equity and that would change a lot of things.

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PS - I've written several articles about this and if anyone is interested, they can view them at, <https://vniwest.com.au>