

**Supplementary
Submission
No 111a**

**INQUIRY INTO FEASIBILITY OF UNDERGROUNDING
THE TRANSMISSION INFRASTRUCTURE FOR
RENEWABLE ENERGY PROJECTS**

Organisation: HumeLink United

Date Received: 6 August 2023

The Hon Emily Suvaal,
Committee Chair,
Standing Committee on State Development
Parliament House
6 Macquarie Street
SYDNEY NSW 2000

6th August 2023

Dear The Hon. Emily Suvaal MLC,

Following on from the submissions and evidence that the standing committee have heard in its inquiry into the Feasibility of Undergrounding Transmission Infrastructure. I urge the committee, to let it not pass us by, the opportunity to uncover the truth behind misinformation about undergrounding but also fire safety and the new argument to connect renewables into HumeLink.

In the following I address some of the issues that Transgrid has failed to adequately address in its submissions.

De-Energising - Not an effective mitigation strategy for bushfires.

It is deeply concerning that Transgrid's spokespeople don't appear to have an understanding of the behaviours, restrictions and capabilities of their own infrastructure in a fire. We keep hearing Transgrid's attempt to reassure people with 'de-energising the lines'. Dunn's Road fire inaction proves that this does not happen when requested, but further to this Transgrid's own experts have revealed details on de-energising to the community, resulting in the understanding that there is no safe mitigation when high voltage lines and fire are involved.

De-energising transmission lines still poses a threat to human life.

In May 2023 at a Community Consultative Group Meeting (CCG), A CCG member posed the question to Transgrid, "Does de-energising pose a threat to human life?" Transgrid confirmed resoundingly that 'Yes it does'.

Transgrid's own experts have told the community that de-energising results in residual energy still being retained in the line and still posing a risk, and where lines parallel there can be power transfer between the live and de-energised line, resulting in the de-energised line becoming re-energised. Therefore, de-energising does not give safe pathway for containment of fires, and should be questioned as it is alarming that Transgrid seek to use this mitigation to placate concerns among residents and RFS personnel. De-energising is further risking the lives of our firefighting personnel in and around the overhead infrastructure, that they are being assured is safe, when it absolutely is not.

As we have learnt from Transgrid's own experts, 'Turning Off' the line is not an option, understandably, due to the associated health implications, potential loss of life and risk for end user electricity consumers relying on the electricity supply, particularly in severe weather and

increasingly high temperatures. Even so, we understand through Transgrid's experts that it is a lengthy process that requires on the ground access to secure and test that the power is no longer live. Being described as a lengthy process requiring time, in an emergency, time is not given, practical or afforded when facing a fierce fire front.

Undergrounding is the only safe option to not only make way for safe firefighting efforts, but to also ensure that the infrastructure asset is protected in extreme weather and fire events. In Transgrid's Independent Red Hat Review, Brendan Nelson who conducted this review stated that; 'HumeLink is a nationally significant project and resilience against future bushfires is critical both from an operational perspective and from an RFS / community safety perspective', and recommended undergrounding. The Red Hat Review also found that during the Dunn's Rd Fire, Transgrid's existing network was impacted, Transgrid's report to the AER identified that there were 65 unplanned outages of the 330kV network in the region, caused by fire damage and arcing.

A disruption to critical infrastructure could have serious implications for business, governments and the community, impacting supply security and service continuity. Infrastructure needs to be secure and resilient as outlined in the legislation of the Security of Critical Infrastructure Act 2018 (SOCIA Act), and Security Legislation Amendment (Critical Infrastructure Protection) Act 2022 (SLACIP Act). Undergrounding HumeLink presents an opportunity to respond to the legislation, safe and sound underground.

Transgrid's own inaction delaying "critical infrastructure"

Transgrid's deliberate efforts to undermine undergrounding HumeLink as a better outcome for the communities, is devoid of consideration of the impacts of an overhead line, and has meant opportunities to commence undergrounding earlier have been missed. Transgrid has had many opportunities to make right for the communities that have been seeking the alternative of undergrounding for 3 years, instead appearing to have misled the Government over this period. When they discuss a longer schedule for undergrounding, that is only an issue because they themselves have created it. A missed opportunity to act sooner, should not leave communities disadvantaged and devastated. We should not bear the brunt of a "too late" decision that the proponent should have been seeking as a result of community concerns and opposition. In the words of Dr Joe McGirr MP, 'it is never too late to do the right thing'.

If Transgrid had acted conscientiously, undergrounding would have been an even cheaper choice for the government but as we stall on this issue, just like the overhead option, and in all industries, the rise in costs continues. The price one year ago cannot now be compared to the price a year on. Transgrid's inability and stalling, to deliberately dismiss undergrounding as a possibility, has been evident. Let that not negatively impact a decision that once again Transgrid have failed to allow space for.

Tapping In, Teeing Off? Or Not?

As I and other community members sat on the Steering Committee for Transgrid's own Undergrounding Study, for a lengthy 13-month period, at no point was it considered, suggested, advised, questioned or vocalised that there was a need/requirement for renewables to tap into the 500kV HumeLink infrastructure along the route.

In the communities' experience with Wind and Solar proponents they themselves have suggested only the need to tap into the existing 330kV and lower high voltage systems, and in one proponent's words, 'We don't want the 500kV'. This was further expressed by the three undergrounding specialists who were invited to appear at the hearing in Tumut. They described HumeLink as a 'Super-Highway,' that should not be tapped into, as this could destabilise the system.

When questioned at a recent CCG about the sudden evolution of HumeLink into a transporter of energy from multiple renewable generation projects along the route, it was clear that Transgrid was using this as a new argument to defend its stance against underground construction. Transgrid has not produced any clear or identifiable modeling or business cases for ANY renewables to be "tapping into" an 500kV overhead system such as HumeLink, that will not have the capacity to be "tapped into". It has also been recently reported in the media that Transgrid spokespeople are suggesting that renewable energy, generated in the Hunter region, will also need to tap into HumeLink. This is again misleading, as given the geographical location, an impossibility.

From CCG Feb 2022 Minutes, a Transgrid Director stated: 'HumeLink's primary purpose is to create part of the superhighway to shunt power one direction or the other.' When asked by a Community CCG member if renewables can cut in, Transgrid noted that 'there is existing infrastructure for that purpose..'

A further question had been asked in a CCG meeting due to the placement of Humelink close to a facility that 'was rumoured' to have plans for renewable concepts, but when asked Transgrid had responded with, 'No renewables will be connecting into HumeLink along it's path'.

Identifying Partnerships to deliver this project together, Underground

Transgrid have failed regional communities in not sharing our concerns with decision makers, when our concerns have been vocalised, are valid, real, and with devastating impacts. We are not disregarding the need for HumeLink, we are problem solving a solution to ensure the project is delivered but in a fair, sustainable and socially and environmentally conscious way. We are saying, "use undergrounding, use our land as passage for undergrounding, we are open and engaged in working on a solution together to deliver this". There is a clear opportunity for partnerships here between Government, Transgrid and Landholders.

Yet, Transgrid are denying the opportunity for this and dangling their overhead plan in the face of opposition which will only grow as a result of what we have seen in their so called 'advocacy' for the community and our pleas for an Undergrounding solution. As we have stated to Transgrid representatives, the inquiry was an opportunity for undergrounding to be considered, and Transgrid had a duty of care to not misrepresent the facts and in fact show the community they were advocating for us as they have been assuring the community they have. But now as a community we have only seen the evidence of Transgrid working against us for their own solution, dismissing our concerns. The underground solution is entirely feasible and world's best practice, our concerns can not and should not be ignored, but seemingly are by Transgrid.

Sincerely,

Rebecca Tobin