

Supplementary
Submission
No 198b

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

Organisation: Stop Rethink HumeLink Campaign

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STOP, RETHINK HUMELINK

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

9 August 2023,

Dear Committee Members,

Thank you again for your efforts to inquire into and report on the feasibility of undergrounding transmission infrastructure for renewable energy projects.

We acknowledge the enormous considerations you have to make, and recognise the significant challenges you have in determining the “real” answers to important questions and finding reliable data that will assist you to ascertain your final recommendation, particularly in absence of a publicly available Environmental Impact Statement.

Like you, the community has attempted, and struggled, to get the “real” answers to questions around very significant issues such as:

- the costing of undergrounding;
- the potential fire risks;
- the impacts on wildlife and the environment; and
- why we remain behind most forward-thinking jurisdictions around the world delivering clean, green underground transmission vs a “spiderweb” of high voltage transmission towers destroying landscapes, covering our nation.

Unfortunately, we feel the committee has received from the proponent on the first and second day of their evidence, vague responses, conflicting evidence, sweeping statements, obfuscation or non-responses.

Further to our supplementary submission following the evidence presented by Transgrid on its first appearance, there were a number of claims made by Transgrid on Monday (7/08/23), which we feel are particularly questionable, disingenuous or erroneous.

We felt it important to bring these issues to light so that the decisions you make are not premised on these claims without alternative information being made available to you.

Cost of undergrounding

Questionable Claim 1: *Transgrid in its evidence said that their cost of overhead had increased by around 30 per cent due to inflation and "applying inflation to that \$11.49 billion (the undergrounding costing) would put it at \$13 billion at the lower end and up to \$17 billion at the higher end."*

This claim does not stack up based on the evidence. While, applying the same inflationary increase for costings that were like for like would be fair, it is simply not applicable in this case because:

- The overhead costing was developed in 2021.
- The underground costing, which was developed for and published by Transgrid, was based on 2022 costings.

Therefore, it is extremely questionable to apply the same percentage increase to undergrounding, given inflation has steadily increased over the years, and has not just spiked by 30 per cent in just one year. Further, to suggest such increase would also be applicable to the independent expert costing, lesser than the Transgrid undergrounding costing, is erroneous given the experts costing were based on 2023 pricing.

Questionable Claim 2: *Referencing the independent expert views on the cost of undergrounding, Transgrid suggested the significantly lesser cost to undergrounding presented didn't include HVDC converter stations.*

This claim does not stack up based on the evidence. One of the independent experts, Les Brand, specifically told the committee in response to his view of the costing released by Transgrid of \$11.49 billion for undergrounding at the Tumut hearing, and which is included in the transcript, was: "We believe that cost per kilometre is somewhere between 60 per cent to 70 per cent of that number ... there is still the cost of the converter stations and all the other costs that go around it, so our estimates come to about 80 per cent of it."

At best, the claim by Transgrid of the expert evidence was one of mis-hearing the evidence by Mr Brand.

The bushfire risks

Questionable claim 1: *In response to the question about transmission lines causing fires, Transgrid emphatically replied with: "we do not have any information that supports that we started a bushfire, since 1960, with our transmission lines."*

Not only does this contradict compelling evidence from volunteers who risk their lives on the front line, and by the NSW RFS in Armidale, but the apparent dismissal of concerns about transmission lines causing fires is in contrast to what Transgrid itself says in its Revised Revenue Report 2023-28 published by the AER, where it proposes a \$61.5 million investment be approved to "address condition issues on the transmission line, avoiding the risk of a failed component sparking a fire in this bushfire danger zone." Page 92, (<https://www.aer.gov.au/system/files/Transgrid%20-%202023-28%20Revised%20Revenue%20Proposal%20-%20202%20Dec%202022%20-%20PUBLIC.pdf>).

Questionable claim 2: *Transgrid continues to suggest that PG&E are only undergrounding distribution based on the word of an executive previously employed at the organisation prior to it undertaking its revolutionary and responsible decision to go underground. This is despite reports that the project includes both.*

Further Transgrid advised the committee that: "Typically, in California, if you go back through the fire starts there — and I lived through a lot of those — they were distribution powerlines. They had different criteria and settings on those lines that do not match how a transmission line is run."

However, the evidence omitted to mention, as Transgrid outlined in its revenue report, that: "In 2018, in California, a failed transmission attachment fitting sparked a fire that destroyed 18,804 structures and resulted in 85 fatalities. Damages attributed to the network operator ran into billions of dollars."

More worrying in relation to bushfires and the risks presented, is a report on the AER website presented by Transgrid (attached) by the University of Melbourne's FIRE Wildfire research arm where all content bar the title page is redacted. One can only imagine that the information in this report is so toxic that Transgrid could not allow even the table of contents to be published.

Impact on the environment

Questionable claim 1: *Transgrid has claimed that undergrounding would prohibit the ability "to do any type of agricultural work that would require any kind of ploughing or disruption of the soil. There is a small layer of native soil a little bit deeper in a high-voltage HVDC line because there is a lower temperature on that."*

Unfortunately, this claim, plus the comment that "I've yet to see somebody do a bore underneath tree for a 500 kV HVDC line", is more an indication of Transgrid's lack of knowledge regarding HVDC undergrounding than the reality.

A report by Europacable states: "The only restriction on the use of land over an undergrounded section is that no deeply rooted trees may be planted within the corridor width plus a margin of about 2 meters to prevent root encroachment into the cable trench. Apart from that there are no limitations to cultivation, including agricultural farming."

Furthermore, it is possible to bore 1000m out to sea, or 1000m under a river, and there are several 300m bores under native trees on Australia's own Marinus Link project.

Unlikely approval by the AER

Questionable suggestion 1: *Throughout the inquiry much has been said about whether the RIT-test applied by the AER would allow undergrounding. The response from the proponent suggests a resounding NO.*

This claim does not stack up given that Marinus Link, a proposed 1500 MW transmission link between Tasmania and Victoria - which includes 190 kilometres of underground transmission on land in Victoria (more than half of HomeLink) - has been given the green light by the AER to progress the project and submit a regulatory proposal for early works.

Conclusion

We acknowledge as one of the committee members noted during the hearings, "it is political decision", though urge you to look beyond the politics and to make the right decisions and recommendations for all – landholders, regional communities, endangered and threatened species, habitats, future generations and the wider community.

Should the Inquiry wish to discuss any of the above or related material, I can be contacted on mobile 0414 271 620 or email michaelkatz79@gmail.com.

Yours sincerely,

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Stop Rethink HumeLink