

**Submission
No 51**

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

Name: Mrs Rebecca Tobin
Date Received: 10 November 2023

Rebecca Tobin

The Director,
Select Committee on the Feasibility of Undergrounding
Infrastructure for Renewable Energy Projects,
Parliament House,
Macquarie Street,
SYDNEY NSW 2000

Friday, November 10, 2023

Dear Director,

Re: Feasibility of undergrounding the transmission infrastructure for renewable energy projects

Thank you for the opportunity to make a submission to this critical inquiry. I write this submission to reiterate my support for undergrounding transmission infrastructure and I refer the committee to my initial submissions on behalf of HumeLink United, and evidence I provided myself in the Public Forum, referred now to this inquiry.

I object to the HumeLink overhead proposal on a number of grounds, as follows, as a concerned community member, daughter of an impacted landholder, and Rural Fire Service Volunteer, and hereby support an underground solution as a means to ensure the transition to renewables is environmentally and socially responsible.

Our family farm is impacted by HumeLink, for a length of 1.23km. This is a 3rd Generation worked farm, with 4th generation prospects for the future. Our property has been lovingly worked by my family since being acquired by my Grandfather as a returned Soldier Settler, and we continue his legacy with plans long into the future. We have an operational Hereford and Poll Hereford Stud cattle, and commercial cattle business. Glenellerslie (our property name) is home to us, and not just confined to the dwellings that exist on the property, but the entire property. It is our workplace, our home, our amenity and the embodiment of who we are and our belonging.

The impact zone of the route through our property, has been defined as environmentally valuable by an Independent Ecologist as a *'Critically Endangered Ecological Community, commonly known as Box Gum Woodland, White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Commonwealth EPBC Act)'*. The Ecologist stated further, *'it's crucial to recognise that the study area constitutes part of the unaffected remnants from past bushfires in New South Wales... data sourced from the NSW Fire Extent and Severity Mapping indicates that the proposed easement area has remained relatively untouched by significant bushfires... while the the surrounding regions*

have been affected. This distinctive status highlights the study area's value as a precious remnant, providing vital habitats for local species.'

I have been an active participant on Transgrid's Community Consultative Group since its inception (October 2021), and on the Steering Committee for Transgrid's commissioned Undergrounding Feasibility Study. Further into this submission I make inferences in regards to consultation, and lack thereof, as well as misrepresentation of undergrounding and Transgrid's unbalanced Undergrounding study of which was not endorsed by the community that sat on the Steering Committee for 13 long months.

I draw your attention to the evidence I provided, in the Public Forum - in FULL below. I also submit further evidence in relation to Transgrid's Public Exhibition of the Environmental Impact Statement.

PUBLIC FORUM EVIDENCE

'HumeLink will be by and large a massive cost not only on us, the people impacted, but also the State.

It will:

- *industrialise our beautiful rural landscapes*
- *result in the destruction of our environment*
- *see workable prime agricultural land lost*
- *have significant impacts on tourism and local economies in Regional NSW;*
- *increase mental health concerns, anxiety, depression, suicidal ideation, and,*
- *pose the greatest of risks and hazards in the next bushfire event.*

These environmental and social impacts are not costed and considered – but they should be!

Internationally, governments are taking into account all costs of overhead transmission, and have moved forward with the notion that underground is the cheapest long-term solution.

We have seen over the last 3 years, people's health deteriorate, and in some cases fail under the stress and absolute lack of empathy and human consideration this project presents. This project is failing regional people, as they feel meaningless, irrelevant and not considered.

In 2021, A survey of landholders impacted was conducted by Wagga MP Dr Joe MGirr, of the respondents 76% stated that HumeLink has negatively impacted their mental health. As this statistic was taken early on, we as a community have witnessed an increase in anxiety, and depression, isolation and increasingly hearing of some members contemplating suicide. We have grave concerns that the largest cost of HumeLink will be people!

This has further been exacerbated by Transgrid's bullying tactics, mistruths, misinformation and withholding of information, repeatedly used in an attempt to push through their overhead proposal. Transgrid's understanding of undergrounding is as outdated and relic as their overhead transmission plan. Transgrid have stated to the community that they are advocating for undergrounding, but have shown no evidence of this. You can not advocate for a better outcome if you

- a) *Are not up to date on undergrounding practices,*
- b) *Mislead government and the public with mistruths and incorrect information to keep pushing your overhead agenda*
- c) *Dont appear to care about the concerns raised by the people and communities to begin with.*

Transgrid's ignorance here is only building a wedge further between the community and themselves. Social licence will only be obtained if HumeLink goes underground!

Living the nightmare that was the Dunn's Rd Fire, it highlighted the reality that we cant fight fires in the vicinity of transmission lines, RFS stipulates this. Transgrid say they work 'hand in glove' with the RFS, we know from experience and the fire ground that this is NOT the case! Adding more High Voltage Power Lines exposes us all, bushfire prone communities and all those impacted in HumeLink's path to an even greater level of risk that can only be described as negligent, and deeming our communities undefendable. There will be an increased risk to human life in every fire for the next 80 years of the overhead lines lifetime. I ask, how can we put firefighters, volunteers, families, communities, people at further risk, when the risks are already so high. There is no acceptable risk when it comes to potential loss of human life, when we have the ability to eliminate the risk by undergrounding.

Undergrounding HumeLink is a viable solution, it is a socially conscious, ethical, safer, more environmentally geared, sustainable and I would have thought 'more Australian', in the hope that we leave no one at the detriment of an overhead option.

And I would like to add from a personal perspective, undergrounding would be a relief, a return of sleep, a removal of fear, anxiety and depression, and an elimination of mental health concerns that have resulted from The HumeLink Overhead Transmission project.

We should want to be proud of the infrastructure we put in place to safeguard our electricity network into the future, something that the next generation can marvel at, rather than gasp at massive archaic overhead infrastructure.

We saw our previous State Government weigh in, and rightly so, on the proposed 73m residential building at Barangaroo, stating it didn't want future generations reflecting on the Government's decision making 100 years down the track, and perceiving that developers were put before people.

Do we really want future generations to look back and question the decision to create a 360 km long, 70 metre wide scar of clear felled land, where trees are replaced by approximately 900, 85 metre towers and wires across NSW. It is difficult to envision Regional NSW in this way, a thick cobweb of transmission lines traversing this beautiful country.

Our safety, our people, our homes, our communities and our environment, 'Our Australia' should come first.

We should be investing now for not only us, but the legacy we leave the next generation, our legacy should see HumeLink Underground.

In the words of our Premier Chris Minns in his victory speech, a statement we hold with great hope, 'The people of NSW have voted to put in a government that will put people at the heart of ALL decision making, and we will not let them down'.

We ask now, please do not let us down!

FURTHER EVIDENCE

After reviewing Transgrid's Public Exhibition of the Environmental Impact Statement for Humelink (EIS), I ask that the below points are considered within this inquiry:

Transgrid do not factor costs to consumers and the wider community that result in the event of a fire, or severe weather events. Due to exposure in fire and severe weather, overhead assets are damaged and outages occur. The extent of damage to Transgrid's network as a result of Black Summer Fires costs consumers and community. The damage is exposed in Transgrid's report 'Overview of 2019-20 Bushfire Damage to Transgrid's Network – Cost pass through application 13 November 2020', https://www.aer.gov.au/system/files/A.2_%202019-20%20%20Bushfire%20Damage%20to%20TransGrid%20Network_%20FINAL_PUBLIC_Redacted.pdf).

In response to Transgrid's 'cost pass through application', the AER determined the following: 'On 4 May 2021, the AER determined that a cost pass through was appropriate and meets the National Electricity Rule requirements. However, the AER has determined that some costs originally proposed by TransGrid should not be included and that the pass through amount should be recovered from electricity users over a longer time frame. The AER approved a pass through amount of \$49.8 million (\$nominal) to be recovered over the following three regulatory years:

- \$15,663,472 (\$nominal) to be recovered in 2022–23
- \$16,593,229 (\$nominal) to be recovered in 2023–24
- \$17,578,174 (\$nominal) to be recovered in 2024–25.'

Not only do the costs need to be accounted for damage to overhead infrastructure but also the costs associated with loss of network and outages, as these costs are inflicted on consumers, businesses and end users, these costs should also be factored in and considered. For the purpose of this inquiry it would be beneficial to explore the total financial cost of damage to Transgrid's network in the 2019/20 fire, and financial costs of loss of network and consider these costs for future climatic and fire events, and ever mindful that over the overhead infrastructure's lifetime damage will likely occur many times over, and each time resulting in further costs to consumers. Based on this itself, to have a resilient network and grid we should not be adding in more high voltage overhead transmission to be exposed to climatic events and be at the mercy of potential damage when it can be placed underground to safeguard and protect the infrastructure, and not cost consumers and communities further.

It is important to include, due to the determinations and recommendations that have been uncovered within it, the RED HAT REVIEW carried out on only specific parts of the impacted Tumut and Bannaby routes that Transgrid specifically requested for analysis. Particularly the recommendation to put the transmission underground in Bushfire Prone Areas. Brendan Nelson from Macroplan conducted the Red Hat Review. Only a summary, as outlined in the CCG Presentation

September 2022 has been provided to the community, though for the benefit of this inquiry it would be imperative for the committee to seek to review the Red Hat Review in its entirety.

<https://www.transgrid.com.au/media/yyspafzk/Humelink-ccg-presentation-sep-2022-snowy-valley.pdf>

Transgrid state the following engagement objectives;

- *'listen to feedback, understand community views, and consider these can deliver a better project'* (They have failed to listen and respond to community input and feedback, and ascertain a better project. Social licence only comes with Undergrounding, as it is the only option that considers community objections, and Transgrid have misrepresented the facts on undergrounding to date)
- *'build on Transgrid's positive reputation and social licence to operate'* (You cannot build upon an unstable, cracked, broken foundation. Transgrid are so poorly respected in the regions, they are unable to stay in certain locations due to community anger, and mistrust, and have absolutely zero social licence in the communities impacted and surrounds.)

Further on Consultation, the Community Consultative Groups (CCG), do not serve as their name suggests, consultation should go both ways, but does not. As a member of the CCG since its inception, I joined in hope that this would provide a platform for us and our communities to be heard. The only purpose I have observed of these meetings is a tick-a-box exercise for Transgrid to push ahead with their overhead agenda. These meetings have a presentation style approach. Transgrid doing all the presenting, and telling the community what they are doing with no consideration for people, the communities impacted and the environment. There is failure to listen, a failure to respond to communities to better the project as is the requirements of consultation, and therefore Transgrid has failed in its requirement to consult.

The EIS uncovered much information that we have not heard or seen before, and much we have requested and not been given (e.g Tower locations). It also attempts to mask the impacts and reality. Some relevant examples:

- Transgrid has only ever discussed a 70m wide easement (originally 80m), however this EIS brings to light that in some areas easements of 110-130 metres wide will be required.
- The community have questioned time and time again the height of the towers, originally documentation and materials stated 50-70m, but when pushed after a Transgrid employee stated they could be 85 m tall, they outed a new size bracket of 60-80 m but not ruling out taller based on the topography.
- When asked in a recent CCG meeting about the maximum height of 76m establishment in this EIS, Transgrid stated that figure was *'for the purpose of the EIS only'*, and would not assure the community that they wouldn't be taller due to the topography. In Tasmania 92m has been suggested as maximum height, how can Transgrid provide a maximum for the purpose of EIS but not the ACTUAL size, this is evidence of Transgrid hiding information from the Public and in fact not providing the 'reality' in important documentation such as the EIS.
- Transgrid's Visibility Maps of directly impacted residences and indirectly impacted neighbours are inaccurate, in some cases residences are missing

and many don't register as having a visual impact because they are outside the 2km corridor. Transgrid have made their own determination categorising the level of visibility, determinations that do not reflect the 'reality' of visibility impacts and in fact is deficient in identifying the true impact on those landholders in and outside the 2km visibility zone. HumeLink's tower's will dominate the landscape, highly visible for much further than 2km.

Transgrid has heard from the community that we are accepting of the alternative to underground HumeLink. Transgrid representatives have said to us that they are advocating for undergrounding, but it is evident that they are misrepresenting the facts on undergrounding. On October 9, independent experts Amplitude Consultants, released their review of the GHD/Transgrid HumeLink undergrounding report. '*HumeLink Undergrounding Review of Transgrid Report and Costing of HVDC Alternatives*', evidently proves that undergrounding HumeLink is absolutely feasible and exposes that the cost of undergrounding HumeLink was seriously exaggerated in the previous study by GHD/Transgrid. Amplitude Consultant's Review provides the cost of delivering HumeLink underground to be only 1.5 times the cost of Transgrid's overhead price of \$ 4.89 billion, significantly and dramatically less than Transgrid/GHD's report estimates, and with an additional potential alternate underground option that is even cheaper again. Undergrounding HumeLink in its proposed route is a \$7.3 billion dollar investment with all the social, environmental and economic benefits and further still with significant savings on lifetime operational costs and maintenance, making undergrounding the best option on cost for the long term, and considerate of and valuing the externalities.

In reference to Transgrid's potential impacts within the EIS, they state '*where feasible and reasonable, the project has aimed to avoid and minimise impacts. Where impacts are unavoidable, mitigation measures have been identified to reduce the likelihood, magnitude and consequences of any residual impacts.*' In identifying the Bushfire risk, the obstruction risk and impeding safe fire fighting efforts to control and fight fires in the vicinity of HumeLink overhead, the only reasonable mitigation is to underground HumeLink as a HVDC alternative. NO risk is a much more powerful and compelling mitigation strategy than imposing MORE risk. It is negligent to put people, communities, homes, properties, livestock and assets of regional Australia at greater risk in the next fire event, when the risk is already so high, and even higher in bushfire prone areas. Our property is located a few mere kilometres from the Dunn's Road Fire ignition point, we are ever so aware of the risk, and the arcing behaviour of High Voltage transmission lines (330kv) in a fire event, we should not be exposing volunteer firefighters and risking their lives putting HumeLink overhead. During the NSW Parliamentary Inquiry, we heard from firefighters on the fire ground, stating that Dunn's Road could have been controlled, but the existing 330kV impeded this as they had to wait for it to pass the structures and lines, and by that point it was too late, it was uncontrollable. Firefighters also provided evidence that the existing 330kV lines have been responsible for starting fires, and contributing to fires. We can not afford to have obstruction, dangerous infrastructure placed in the way of controlling fires, and presenting a dangerous threat to human life.

It is of great concern that in the EIS Transgrid states on Operational Impacts for the longevity of HumeLink's lifetime, '*changed bushfire risk to surrounding vegetation and EMF exposure to native fauna.*' A HVDC alternative underground system would provide no exposure to EMF and would have

no bushfire risk associated with it, safe and sound underground. This also raises the question of EMF exposure to humans and livestock, as well as bushfire risk to homes and property surrounding HumeLink. When Transgrid have been asked about EMF exposure in CCG meetings, they have held the position that there is no exposure risk, and that there are no studies to suggest that there is such, yet here is a statement in their EIS that clearly states there is EMF exposure to native fauna. Transgrid has failed to provide the community with assurances around EMF exposure, with a 'there is nothing to see here' attitude. We live in a time where we are conscious of the impacts of human influence and actions on our environment, native habitats, flora and fauna, and also those that result with impacts on people. The community has provided Transgrid with case studies from overseas, and received no acceptance, commentary or response to these. Some examples the community have sourced are:

<https://www.lefigaro.fr/conjoncture/tres-haute-tension-rte-condamne-a-verser-plus-de-450-000-euros-a-des-eleveurs-20220603>

<https://www.irjet.net/archives/V2/i3/Irjet-v2i379.pdf>

Transgrid states that there are *'90 Aboriginal Heritage sites and potential archaeological deposits within HumeLink's footprint'*. It is alarming that when these sites fall within the easement of HumeLink, in the next fire event they will be lost to us all, due to the inability to fight fires in and around HumeLink overhead. It is in our best interests to protect these important Aboriginal sites and artefacts by placing HumeLink Underground, so that we can protect these critical deposits, rather than decimate them by industrialising them and exposing them to further bushfire risk and damage. Undergrounding could ensure that these areas are avoided and every chance given for them to be retained for the future.

The EIS states in regards to Non - Aboriginal Heritage sites, that *'Indirect visual impact is expected to have a negligible impact on the heritage significance of these places'*. Industrialising places of heritage and significance to us as Australians, is deplorable, visibility classifications within the EIS are not indicative of 'reality', we are making a grave mistake to have the proponent make these 'determinations' on the impact of overhead infrastructure on places of historical and heritage significance when they hold bias for their overhead proposal.

It bears no weight to Transgrid that there is direct impact to the Generational Heritage of those families and properties impacted. Examples; Soldier Settlement Blocks of Ellerslie Station, Landcare Projects by family members and communities, Property infrastructure built by early farmers and family members, private cemeteries/memorials, all imposed and changed forever, with significant relevance to families, communities and those that live there. Legacy and heritage of generations disturbed and impacted without consideration as they are not 'listed'.

Transgrid states that *'there are 9 dwellings within the project footprint with only one dwelling likely to require demolition or relocation'*. When a statement is made in this EIS about the changed exposure to EMF for native fauna, and here we have people's homes within the 70m easement. What about the impacts of EMF on people, or the fact that those homes will have no chance to be saved in the next fire event. Undergrounding would ensure that there are no homes impacted negatively within a 15 m easement, and would work more effectively to divert to avoid them.

Transgrid are making very harmful, unqualified statements on permanent agricultural impacts. From the following statement it is obvious that the Agricultural impacts were not made with consultation from an expert in the field, and also highlights Transgrid's inability to hear our experienced community of impacted Farmers. Ignorantly stated in the EIS *'Restrictions on: aerial agricultural operations, grain loading/unloading, drone use, maintenance of fruit trees, crop spraying. Overall the impact of the project on agricultural production would be minimal due to the small area affected relative to the total size of agricultural enterprises.'*

For us, aerial agricultural operations that we conduct on our property are for fertilising and spraying our steep country, we use helicopter as a safer option than by ground, it is an important part of our operation in pasture improvements and being unable to continue to carry out this operation due to safety concerns for the helicopter pilot is a major impact on our operation moving forward. Not being able to use modern farming practices on our property, such as drones, limits us from bringing our operation into the new technological era, which is not a minimal impact, it is a large impact, and an enduring one. We have asked Transgrid about the impact of EMF exposure on our livestock and unborn foetus of our pregnant heifers, and have never gained a response that suggests that EMF exposure is problematic, but the EIS points out the existence of EMF radiation exposure on native fauna, Transgrid have failed to give us this crucial information. There is no difference to the exposure of EMF to native fauna, and our livestock, we can not afford for our Stud cattle and commercial herd to be adversely impacted by Humelink overhead, it is of high importance to our production and breeding to have healthy cattle with optimal figures to succeed in our industry. Humelink has a massive impact on day-to-day operations for all farm operators who will have to travel under and conduct farming activities under these lines, with the ever present overhead structures and obstructional towers which present risk to them when using machinery. With the lowest set of lines being only 12m from the ground, and the sagging nature of overhead lines, I question the 4.3m clearance that Transgrid have stipulated to be adhered to, when Victoria has recently undertaken safety actions that have recommended a 3m clearance.

The EIS states *'Direct adverse residual impacts would be largely at a local level in cases where permanent land adjustments are required. These impacts would be managed through landowner agreements'*. Yet, there need NOT be these permanent scars, adjustments to land, carving out hills to put in towers, and crane pads. The rural landscape should be treasured, respected and preserved for future generations, not destroyed by archaic towers and wires representative of the past. Underground HVDC is NOW, and is a socially conscious, ethical, safer, and more environmentally geared solution that protects our rural amenity.

When Transgrid refers to Economic Benefits for Regional Communities, it is only ever the benefits during the construction period, local employment opportunities, and workers spending money in towns, it seems the expectation of Transgrid and Government is that Regional people are supposed to be grateful for this benefit. Yet, there is no benefit to Regional Communities, only destruction to our communities, and the burden we will bear long into the future can not be weighted or negated by a short term so-called 'benefit'. Economic benefits go wider than short term employment opportunities, short term spending, and short term financial gains to attempt to cover up the economic impacts to tourism in our regions, economic impacts on agriculture, economic impacts on individual landholders, economic impacts on our places of heritage, economic impacts on the environment and economic impacts long into the future where bushfires can not be controlled

around this overhead infrastructure causing widespread damage. When it does not have to be this way, a HVDC underground solution will simply not leave lasting impacts, and leaves our regional communities in a seemingly 'untouched' state without the ominous burden of overhead infrastructure. It is important for the purpose of this Select Committee inquiry, that it seeks to consider all costs estimated for Economic impacts on ALL externality impacts, not only limited to short term impacts during construction but over the lifetime. (Tourism, agriculture, heritage, social, environment, and bushfire damage).

On Social Impacts, it is absolutely disrespectful to communities impacted by HumeLink for Transgrid to suggest in the EIS that there are *'positive social benefits that have been rated as 'high' or above'*, all of which are again short term construction related like the economic suggestions. And go on to list that *'increased tourism from temporary workers and their visitors'* as a positive, but all in the cause to destroy our beautiful rural landscapes and negatively impact regional tourism potential. The social impacts are a double negative on every front, as then within the EIS Transgrid continues *'negative social impacts that have been rated 'high' or above, in significance following implementation measures including; -impacts to the visual landscape and scenic quality, where construction will temporarily disrupt the views and amenity for dwellings near the project footprint and affect people's enjoyment of their local areas and sense of pride.'* But yet, during construction tourism from workers and their visitors will be highly rated as positive? At the same time impacting the enjoyment of our local areas and sense of pride, this is not just a temporary obstruction of view for construction only, this is an obstructed and changed view forever for those impacted, industrialising our beautiful rural landscapes and communities. And *'stress and uncertainty arising from property acquisitions, creation of easements and leases, which may affect how landowners use their properties and go about their day-to-day activities'*, again this is not limited to construction and bullying to acquisition, this is enduring stress imposed on landholders and families, stress around risks to our legacy, our livelihoods, and the imposing of greater fire risks that will burden our generational farming families and long history of volunteer firefighting families. This is enduring stress for the long-term. It has already been 3 years of stress, and time taken out of our lives to be focused on a project that impacts our lives long into the future, one of which we fight with all our might as we object to the conditions, and are not considered by Transgrid or Government, fighting and advocating for an underground HVDC solution to protect us, our families, our neighbours, our communities, our workplaces, our environment and our future generations. The only mitigation that will combat this negative impact is going underground, no amount of money, no amount of screening, no amount of noise proofing homes will replace what HumeLink is taking away and destroying, underground is the only way forward.

On Social impacts, it is negligent of Transgrid to 'leave out' of the EIS the mental health impacts on impacted landholders and those indirectly impacted. At CCG meetings, this topic has been forced upon Transgrid, and at every instance is ignored, brushed over, not met with empathy or concern as they bulldoze their overhead agenda through. People in our community are experiencing thoughts of suicide, anxiety, depression, and this is voiced time and time again, yet it is not recognised by Transgrid as to the severity of the mental health impact. I can assure you, suicide because of HumeLink, it's impacts, and the long term impacts for our lifetime and the next generation, is a real concern in our community, the largest cost of this project I fear will be people. Undergrounding will

give people their lives back, and eliminate mental health concerns that are resulting directly from Transgrid's overhead plans.

Transgrid states that *'to avoid and minimise permanent impacts on landscape character and visual impacts have been considered in the refinement of the project footprint. This includes paralleling existing transmission lines.'* Paralleling existing transmission lines does not minimise permanent impacts on landscape character and visual impacts. Instead there are cumulative negative impacts added to these areas, impact upon impact to industrialise a landscape. The enormous structure of HumeLink 500kV dwarfs a 330kV structure, there is an even greater fire risk exposure to those within and near the footprint, a larger area that can not be defended in the next fire event by air or by ground, and an increased risk of fire ignition, from either or both structures. We are ever conscious of the implications of one set of lines, it is fear provoking and stressful to have another set of lines parallel and put us and our community at further risk, especially when the risk is already so high in a bushfire prone area as we are classified as. Our property is also classified on Transgrid's original bushfire maps as a Tier 2, which Transgrid state as areas they avoid during route selection, as high risk. Transgrid's mitigation for 'some' properties is to visually screen, I presume with mature planted trees that I can not imagine will be tall enough to screen a +76 m tall structure, and would come at a large cost as a mitigation strategy to 'screen' structures. A cost that would be better spent on undergrounding, and therefore not having the necessity to screen in the first place. Undergrounding via HVDC would be a more appropriate and successful mitigation, with no permanent visual or landscape character impacts. Due to the EIS it is also now apparent to us the greater noise and vibration impact of paralleling lines. It would be prudent to this inquiry to consider the extra costs incurred for Transgrid's mitigation strategies for visibility and noise impacts, within the EIS they are proposing screening for visibility impacts, and noise proofing of homes.

On Noise impacts, Transgrid states *'where existing High voltage lines run parallel to the project, cumulative noise levels are expected to be marginally greater, with 65 receivers predicted to potentially exceed criteria'*. They report that the noise from HumeLink, in certain weather conditions, will exceed NSW Noise Guidelines night time criteria (greater than 35dBA). This is unacceptable for those living in and around the lines, and does not give consideration to native fauna and livestock that will be impacted by noise. When Transgrid suggests yet another excess cost as a mitigation strategy to 'sound-proof' homes, again spending this extra residual cost on HVDC undergrounding HumeLink will go further than putting band-aid solutions across the devastation imposed by overhead infrastructure. Also, what protection measures are there for people when they are outside of their dwelling, whilst working or leisure in close proximity to said dwelling, and/or the overhead infrastructure?

In response to the EIS references to Hazards and Risks;

Bushfires - Transgrid's inputs in relation to the potential impact and management of Bushfires is disingenuous. This has been a highly contentious issue and Transgrid has done nothing to alleviate community concerns and opposition only grows as a result. It is negligent to put people and communities at further risk when the risks are already so high. Our communities are fearful of the next fire, ever present in the recalled accounts and experiences in the Dunn's Rd Fire from family members, volunteer firefighters, incident controllers, and Brigade Captains. Accounts where the 330kV lines impeded the ability for RFS to control the fire before it exploded to devastate our

communities, witnessing arcing behaviours of the 330kV line that drove home how dangerous these structures can be and the threat to human life they pose. The proposal for HumeLink 500kV overhead, has us even more fearful of what is to come in the next fire event, making swathes of areas undefendable, and further risking lives, property and animals. In the EIS Transgrid cares not for the imposing of greater fire risk they are bringing to people and communities, or the impediment and risk HumeLink has on safe fire control. Transgrid have focused only on the safety and procedures for their workers, and the protection of their infrastructure assets with '*adoption of asset protection Zones and transmission line clearances*', not on the people that will be burdened with the threat for the next 50-80 years. They make reference to their so-called stringent 'vegetation management program', with 40 years experience of their 330kV easement on our property, the 40 years of debris left to bank up as fire fuel load, and the neglect in maintaining their current easement gives us little hope, faith, or confidence in their words. 40 years of evidence of not maintaining these easements can not be replaced by promises to do better. The only confidence method for us and our communities is to put this infrastructure underground and there will not be the need to rely on empty promises by Transgrid, or the extra expense on the consumer to fund ill carried out maintenance programs for the next 50-80 years. In the EIS it is implied that there are emergency preparedness and response procedures, that only point to evacuating, but we are the ones that will be responding, we volunteer firefighters, we community members will be expected to fight fires that result during HumeLink construction, HumeLink Operation, and those who will be risking our lives. Undergrounding via HVDC has our lives valued and considered, and protected long into the future, an ever mindful solution to avoiding generational impact on families of volunteer firefighters and their children.

In relation to the citing of Transgrid's '*independent investigation*' into undergrounding, that was '*carried out in consultation with an Undergrounding Steering Committee*'. Transgrid failed to mention that there were 52 outstanding issues that the community on the Steering Committee still hold outstanding, and due to the report being flawed, and unbalanced with excessive exaggeration of the capital costs, we as the community members on the Steering Committee did NOT endorse the report. It is neglectful that Transgrid did not include that the report was NOT endorsed by the Steering Committee and our reasoning for this. Failure to do so is not considered honest or forthcoming. Their reference in the EIS suggests that '*Transgrid confirmed undergrounding HumeLink would not be consistent with the regulatory rules that require Transgrid to propose the most efficient option for consumers based on the capital cost of the solution, the ongoing operational costs, the market benefits, the expected reliability, and the costs associated with the impact on landowners, the community and the environment.*' However, this is not consistent with the regulatory rules and requirements, the only requirement is the cheapest capital cost for consumers, so this is false and incorrect to be stated to the public and in the EIS. Undergrounding is most certainly the cheapest long term solution when you take into account all externalities, non -market social and environmental benefits, protection and no further costs incurred from damage in fire and extreme weather events, and lower operational and lifetime maintenance costs, and internationally is world's best practice due to these factors. If it was the case that all these costs, including lifetime operational costs, lifetime maintenance costs, costs associated with the impact on landowners, the community and the environment, and don't forget agriculture and tourism (All externalities), then it needs to be requested of Transgrid to provide evidence of these costings for the public to review because thus far we have not been provided with them.

Climate Change is the premise for the need for Snowy 2.0 and HumeLink. I support the transition to renewables so that we are decreasing our impacts, but the negative social and environmental impacts of HumeLink overhead are too great, undergrounding negates and lessens these impacts. Climate Change is also the reason for the importance of protecting our infrastructure assets and protecting people. Quoted from Transgrid's EIS, *'As the project is likely to be exposed to a number of climate change risks, increased temperatures, bushfire, which could damage the transmission lines and reduce their transmission capacity... Climate change is also anticipated to impact materials such as concrete and steel'*. Here we hear from Transgrid admittance that HumeLink will be exposed to climate change, and climatic events, damage will occur to the assets just as they did during the Black Summer Fires. Millions of dollars will be required to repair them in EVERY fire over the lifetime of the asset. Further still, liability claims will no doubt come into play if HumeLink is responsible for starting a fire, impedes control of a fire, or a life is taken by or as a result of the infrastructure, which begs the question who takes responsibility? Transgrid /Government /Consumers? To avoid all of this extra cost and risk, to not only people, communities and environments, but also the infrastructure itself, Underground is the only way forward.

In Australia, private companies are opting to put transmission projects underground, including Murraylink, Marinus link, Star of the South, and Directlink.

So why not HumeLink?

In order to minimise the above impacts, I urge the Select Committee to recommend undergrounding the HumeLink project, for a better solution for us all.

Yours sincerely,

Rebecca Tobin

Community Advocate