**How to Make a Submission on the Draft Victorian Transmission Plan**

**Deadline: 11:59 pm, Tuesday 24 June 2025**

**Step 1:** Write your submission in a Word document (or similar).

**Step 2:** Use the **Key Issues for Response to the Draft 2025 Victorian Transmission Plan** (below) as a guide to help shape your own submission. You can include these points directly, adapt them in your own words, or use them for inspiration.

**Step 3:** Save your submission file.

**Step 4:** Go to this link: <https://engage.vic.gov.au/project/victransmissionplan/survey/5817>

**Step 5:** You can choose whether or not to enter your personal details in the form.

**Step 6:** Upload your submission document. This step is essential for your submission to be counted.

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**Key Issues for Response to the Draft 2025 Victorian Transmission Plan**

This paper outlines the primary areas of concern identified in the Draft 2025 Victorian Transmission Plan (VTP).

1. **Classification of Western Renewables Link (WRL)**

The Draft 2025 Victorian Transmission Plan (VTP) has been criticised for misclassifying the Western Renewables Link (WRL) as a committed project, despite its actual status as an anticipated project under the Australian Energy Market Operator (AEMO) framework. [See Draft VTP, Section 4.2.2]

1. Key Issues with the Classification:

* Predetermination of WRL: The VTP treats WRL as a baseline infrastructure in all scenarios, without considering alternatives where the project is delayed, reconfigured, or does not proceed. In community meetings, the AEMO has publicly acknowledged numerous shortcomings in the way it has handled many aspects of the WRL, and has stated that it will do things differently for future projects, however that it’s unfortunately too late to make changes to the WRL as is a committed project.
* Misalignment with AEMO’s Frameworks: AEMO classifies WRL as an anticipated project, meaning it is expected but not yet fully committed. However, the VTP assumes WRL is a definite outcome, contradicting both the National Electricity Rules and the Australian Energy Regulator’s (AER) cost-benefit guidelines.
* Lack of Alternative Scenario Planning: The plan does not explore lower-impact or community-supported alternatives, such as the Syncline Community Cable, which could provide similar benefits with fewer disruptions.
* Community and Traditional Owner Concerns: The VTP does not adequately address public opposition and cultural heritage considerations, admitting that its own heritage assessment is incomplete.

1. Recommendations from Critics:

* Transparent modelling of alternative futures, including scenarios without WRL.
* Formal acknowledgment of the VTP’s convergence with previously rejected ideas, such as upgrading existing transmission corridors.
* Robust economic comparisons of all viable options.
* Introduction of a negotiated settlement framework that involves landholders, Traditional Owners, and communities in decision-making.

The misclassification of WRL as a committed project raises concerns about transparency, stakeholder engagement, and regulatory alignment, and will likely result in several significant consequences, such as:

1. Regulatory and Financial Risks:

* Non-compliance with National Electricity Rules (NER): The classification contradicts AEMO’s framework, which considers WRL an anticipated project rather than a committed one. This could lead to legal challenges or regulatory scrutiny.
* Distorted Cost-Benefit Analysis: Errors in the WRL’s financial assessment have been identified, including omitted operation and maintenance costs and incorrect market benefit calculations. These miscalculations could result in negative net benefits, meaning the project may not be economically viable.

1. Impact on Alternative Solutions:

* Lack of Consideration for Other Transmission Options: By treating WRL as a certainty, the VTP fails to explore alternative solutions, such as upgrading existing transmission corridors or community-supported projects like the Syncline Community Cable.
* Missed Opportunities for Lower-Impact Infrastructure: Alternative designs that could reduce environmental and social disruption are not properly evaluated, potentially leading to higher costs and community opposition.

1. Community and Environmental Concerns:

* Public Opposition and Legal Challenges: The WRL has faced strong resistance from landowners and Traditional Owners, who argue that the project disregards cultural heritage and environmental impacts.
* Incomplete Environmental Assessments: The VTP acknowledges that its heritage and environmental impact studies are unfinished, raising concerns about inadequate risk mitigation.

1. Long-Term Energy Planning Issues:

* Potential Overinvestment in Infrastructure: If WRL is built based on flawed assumptions, Victoria could overcommit to unnecessary transmission infrastructure, diverting funds from more effective renewable energy projects.
* Reduced Flexibility in Future Energy Planning: Locking WRL into the plan limits adaptability, making it harder to respond to changing energy demands and technological advancements.

The misclassification of WRL as a committed project will undermine transparency, economic efficiency, and community trust. Significantly, the Western Renewables Link (WRL) also poses several heightened risks for communities due to the government's shift toward distributed battery storage and other decentralised energy initiatives. These changes challenge the original assumptions behind WRL and introduce significant negative impacts:

1. **Selective Adoption of Previously Rejected Ideas:**

The plan quietly embraces principles central to the dismissed “Plan B” approach, such as upgrading existing corridors, without acknowledging or explaining the reversal, highlighting that AEMO realises that its initial planning was flawed, thus losing significant credibility.

1. **Increased Community Disruption:**
* Land Acquisition Issues: WRL requires extensive land corridors, leading to forced acquisitions and disputes with landowners.
* Environmental Concerns: Large-scale transmission projects like WRL can cause habitat destruction, disrupt ecosystems, and impact cultural heritage sites.

1. **Reduced Necessity for Large-Scale Transmission:**

* Distributed battery storage allows renewable energy to be stored and used locally, reducing the need for long-distance transmission lines like WRL.
* Community battery networks provide grid stability without requiring massive transmission projects, making WRL less relevant.

1. **Financial and Regulatory Uncertainty:**

* WRL was justified based on older energy models that assumed centralised transmission was the best way to integrate renewables. However, new policies favour decentralised solutions, raising concerns that WRL could become a stranded asset.
* Regulatory reviews may challenge WRL’s cost-benefit analysis, especially if alternative investments (like battery storage) prove more cost-effective.

1. **Increased Community Opposition:**

* The shift toward localised energy solutions strengthens arguments against WRL, as communities now have viable alternatives that avoid land acquisition disputes and environmental damage.
* Landowners and Traditional Owners may escalate opposition, citing government-backed alternatives that do not require large-scale transmission corridors.

1. **Environmental and Grid Stability Risks:**

* WRL’s environmental impact assessments were conducted before the government’s battery storage strategy gained momentum. This means new environmental risks—such as unnecessary land clearing—may not have been properly evaluated.
* Grid stability concerns arise if WRL is built but fails to integrate effectively with distributed energy resources, leading to overinvestment in outdated infrastructure.

1. **Potential Project Delays or Cancellation:**

* If government priorities shift further toward decentralised energy, WRL could face funding cuts, regulatory hurdles, or outright cancellation.
* Alternative transmission projects that align better with distributed energy strategies may be prioritised instead.

1. **Credibility Considerations:**

AusNet’s handling of the Western Renewables Link (WRL) has been marked by misinformation, deception, and aggressive land acquisition tactics, which has significantly undermined its credibility, as well as that of AEMO, which has been perceived as complicit in the process. Proceeding with the VTP in its current form will only result in the following:

1. **Significant Erosion of Public Trust:**

* Misinformation & Lack of Transparency: Landowners and the community have reported continual contradictory and misleading statements from AusNet regarding project suitability, the sincerity of consultation, undergrounding consideration, fire risks, adverse weather survivability, technological obsolescence, the true effectiveness of failsafe technology, setback distances, maintenance requirements, complexity, cost, compensation, environmental impact, and project necessity.
* Community requests for transcripts of Ausnet and AEMO Community Meetings, Question and Answer sessions, community submitted information, or summaries of public data stored on Ausnet’s web site, and the like, are systematically ignored, or delayed, deferred and subsequently denied.
* Divide-and-Conquer Tactics: Communities have accused AusNet of isolating landowners to weaken collective opposition, fostering distrust.

1. **Regulatory & Legal Scrutiny:**

* Conflicts of Interest: Concerns have been raised about AEMO’s CEO serving on AusNet’s board during the WRL tender process, raising questions about impartiality and corruption of the Tender and Procurement process.
* Community requests for access to the original WRL Tender documents have been stringently opposed by both Ausnet and the AEMO, further fuelling corruption speculation.
* Failure to Follow Proper Consultation Processes: Critics argue that AusNet has ignored community feedback, violating best-practice engagement standards.

1. **Political & Economic Fallout:**

* Calls for Government Intervention: Energy experts warn that AEMO prioritises corporate interests over community welfare, urging the government to reclaim control over transmission planning.
* Potential Project Delays or Cancellation: Public opposition and legal challenges could stall WRL, forcing a reassessment of Victoria’s transmission strategy.

1. **Damage to Renewable Energy Transition Plans:**

* Loss of Support for Future Projects: The backlash against WRL has weakened public confidence in large-scale renewable infrastructure, making future projects harder to justify.
* Missed Opportunities for Better Solutions: Alternatives such as upgrading existing transmission corridors or distributed battery storage have been overlooked, despite being more community-friendly.

The VTP doesn’t address impact of the lack of Infrastructure Insurance. Ausnet’s inability to obtain insurance cover for the WRL Transmission Line Infrastructure poses several significant risks to communities.

1. **Reliance on Force Majeure Provisions to fund repair works:**

* A lack of Transmission Line Insurance cover results in a reliance on Contractual Force Majeure provisions to deal with extreme weather events that adversely impact overhead transmission infrastructure, leading to a significant and additional taxpayer financial burden to remediate, repair and restore service.

1. **Financial Burden on Affected Landowners:**

* In the event of damage or failure, landowners near transmission lines may struggle to claim compensation for losses.
* Legal disputes could arise over who bears financial responsibility for infrastructure-related damages.

1. **Increased Risk in Fire-Prone Areas:**

* Transmission lines can spark fires, especially in dry conditions. Without insurance, communities may face difficulties recovering losses from fire-related incidents.
* Emergency response costs may shift to local governments and residents, increasing financial strain.

1. **Limited Accountability for Infrastructure Failures:**

* Utilities often investigate their own Infrastructure failures without adequate independent oversight. This can result in root causes being inaccurately attributed or reported.
* If transmission lines fail due to poor maintenance, communities may lack the necessary visibility, proof or legal recourse to demand repairs or compensation.
* Regulatory bodies may need to intervene more frequently, leading to delays in addressing safety concerns.

1. **Potential Grid Reliability Issues:**

* Without insurance, funding for urgent repairs may be delayed, increasing the risk of prolonged power outages.
* Critical infrastructure failures could disrupt businesses, hospitals, and essential services.

1. **Legal & Regulatory Consequences:**

* Government intervention may be required to enforce financial responsibility for transmission-related damages.
* Public trust in AusNet and energy regulators could decline, leading to policy changes or stricter oversight.

1. **Bankruptcy Risk:**

The VTP fails to address the WRL Bushfire Compensation Risk. Ausnet could face the same scenario as Pacific Gas & Electric (PG&E), who filed for Chapter 11 bankruptcy protection in January 2019 due to massive financial liabilities stemming from wildfires, including the 2018 Camp Fire, which was California’s deadliest and most destructive wildfire.

The key reasons for Bankruptcy Filing were:

Liability for Wildfire Damages

* PG&E was found responsible for sparking multiple wildfires, including the Camp Fire, which destroyed the town of Paradise, CA, killed 86 people, and caused $7 billion in damages.
* The company faced an estimated $30 billion in liabilities from lawsuits filed by wildfire victims, insurers, and government agencies.

Legal & Financial Pressures

* PG&E lacked sufficient funds to cover compensation claims, with only $1.5 billion on hand while facing billions in lawsuits.
* Filing for bankruptcy allowed PG&E to pause lawsuits and restructure its debts while continuing operations.

Impact on Wildfire Victims

* The bankruptcy delayed compensation payments to victims, leaving many in legal limbo.
* PG&E established a Fire Victim Trust with $13.5 billion, but half of it was in company stock, meaning payouts depended on PG&E’s financial performance.

Regulatory & Political Fallout

* California lawmakers refused to bail out PG&E, forcing the company to seek bankruptcy protection.
* The bankruptcy raised concerns about utility accountability and future wildfire prevention efforts