



Australian Government

Australian Energy Infrastructure Commissioner

25 July 2025

Richard Owens
Review Lead
Farrier Swier Consulting
via email: transmissionplanningreview@dcceew.nsw.gov.au

Dear Mr Owens,

Re: NSW Transmission Planning Review 2025—Interim Report

Thank you for the opportunity to provide feedback on the NSW Transmission Planning Review 2025—Interim Report.

As outlined in my previous submissions, the Australian Energy Infrastructure Commissioner (AEIC) is an independent non-statutory role appointed by the Australian Government and supported by the Office of the AEIC. We seek to maintain and build a capacity for trusted and useful information to ensure the energy transition is as efficient, equitable and smooth as possible.

Since the expansion of the AEIC's terms of reference in 2021 to include new major transmission infrastructure, our Office has promoted transparency, information sharing, and best practice community engagement for transmission projects across Australia.

Our Office welcomes the progress made in the review and the release of the draft recommendations outlined in the Interim Report. We offer the following comments in response to the Interim Report's draft recommendations below for your consideration.

Clarification of roles, coordination and timeliness of NSW transmission planning

Transmission planning is an inherently complex task and one that is crucial in ensuring new generation capacity is available as coal-fired generators in NSW are retired. The *NSW Transmission Planning Review 2025* has made important steps in identifying existing duplications in NSW's transmission governance arrangements and proposing solutions to ensure better coordination between relevant entities.

Our Office understands the significance of addressing these challenges while ensuring genuine community engagement and improved levels of transparency in these processes. The Community Engagement Review (2023) identified a number of ways community engagement could be improved through making reforms to planning and approvals processes. In that

Review, a common sentiment expressed by community members and landholders was that planning frameworks were overly complex to navigate and understand, and the planning process was too long. Community stakeholders documented experiencing consultation fatigue which is often exacerbated by project delays and can cause stress and anxiety.

As identified in the Interim Report, under the current transmission governance arrangements in NSW there are multiple bodies with overlapping roles which can create confusion around roles and responsibilities and subsequent accountability gaps and inefficiencies. Such arrangements are likely to exacerbate these sentiments towards the planning process and the renewable energy industry more broadly. Consideration should be given to ways in which the process can be better communicated and explained so that the community is better able to identify respective processes and where they can provide meaningful input.

The current Review offers an important opportunity to address these concerns in NSW in relation to transmission infrastructure deployment and the development of Renewable Energy Zone (REZ) infrastructure. The challenge of getting community engagement right is undoubtedly difficult and we would like to acknowledge and recognise the activities and measures EnergyCo has undertaken to try and improve community engagement. That being said, there remains clear room for improvement. The targeted reforms outlined in the Interim Report to improve the clarification of roles and responsibilities are welcomed by the AEIC and we believe they will help clarify and improve the coordination of transmission planning in NSW.

Notwithstanding these measures, it is important to ensure that the acceleration of planning and delivery specific to the New England REZ, but also more broadly, does not come at the expense of meaningful community engagement and opportunities for community members and landholders to provide input into the planning process. There must be comprehensive reviews of the cumulative impacts on the REZ's and planning decisions. Without it, the community confidence and trust in the planning process will continue to decline. The AEIC is regularly provided with feedback on the opaqueness of the planning process. There must be more explanation, transparency and engagement so the community has an increased level of trust and awareness of the planning process – specifically in relation to energy infrastructure and the impacts it may have on the community.

It is encouraging that alternative options to transmission infrastructure, such as distribution and non-network options, are considered in the Interim Report which could prove to be more cost effective for electricity consumers and less intrusive for communities. This is an important addition given the angst associated with transmission infrastructure.

Enhancing community engagement and transparency

The Interim Report's draft recommendations centring around enhancing community engagement and transparency should help address some of the concerns mentioned above.

Draft recommendation C.1 focuses on implementing best-practice engagement obligations and impacts primarily EnergyCo. We agree that making amendments to the *Electricity Infrastructure Investment Act 2020* or *Electricity Infrastructure Investment Regulation 2021*

requiring EnergyCo to genuinely engage with host communities potentially affected by priority transmission or REZ network infrastructure projects will improve consistency in engagement obligations. In our view, there is a critical need for a more collaborative approach to community engagement and more tangible and long term sharing of value. The advice the AEIC receives suggests the electricity sector must be held more accountable on genuine community engagement and the delivery of value to the broader community. The views of many in the community suggest the sector must demonstrate they are undertaking best practice engagement and more clearly document how they have addressed and/or considered community concerns and suggestions to maintain and build community belief and trust. We note that EnergyCo has existing community engagement requirements under the *Environmental Planning and Assessment Act 1979* and engages with communities through their REZ Community Reference Group. However, our Office has received complaints from concerned residents who say EnergyCo has fallen short of best practice community engagement, and therefore stands to be improved with more consistent obligations through making the above-mentioned amendments.

The Review's Options Paper previously raised the possibility of a Consumer *and* a Community panel—separate or combined—which the AEIC was supportive of. The Interim Report has chosen to focus on the establishment of a Consumer Panel, which we believe represents a potentially positive measure for electricity consumers. We agree that there will be locally specific issues that are difficult for a single *community* panel to cover effectively, and that the above recommendation can help improve community engagement. Panels are just one option for implementing broader community engagement requirements, and individual REZ-specific community reference groups for each NSW REZ could help to enhance community engagement while better understanding localised issues.

Improved transparency in decision making around transmission planning is important and we agree with the Review Team that, when suitable, EnergyCo and AEMO Services publish drafts of recommendations and/or decisions for public submissions. The ability for EnergyCo to retain suitable specialist staff to build relationships and undertake empathetic community engagement is also a welcome inclusion in the draft recommendations.

Further information

Thank you again for the opportunity to provide some comments regarding the NSW Transmission Planning Review 2025—Interim Report. I consent to any publication of this submission and may make a copy available through our website at aeic.gov.au. If you have any further questions or wish to discuss this submission, please do not hesitate to contact us via email at aeic@aeic.gov.au or on 1800 656 395.

Yours sincerely,

TONY MAHAR
AUSTRALIAN ENERGY INFRASTRUCTURE COMMISSIONER