



Australian Government

Australian Energy Infrastructure Commissioner

19 May 2025

Richard Owens
Review lead
NSW Transmission Planning Review
Farrier Swier Consulting

via email: transmissionplanningreview@dcceew.nsw.gov.au

Dear Mr Owens

Re: NSW Transmission Planning Review 2025 Options Paper

Thank you for the opportunity to provide feedback on the NSW Transmission Planning Review Options Paper.

As noted in my response to the review's consultation paper, the Australian Energy Infrastructure Commissioner (AEIC) is an independent role appointed by the Australian Government, reporting to the Minister for Climate Change and Energy and the Australian Parliament. Since the incorporation of new major transmission infrastructure into the role's terms of reference in 2021, the AEIC has worked with a range of stakeholders to help resolve enquiries and complaints regarding major transmission infrastructure projects, with the aim of helping to make the energy shift smoother and fairer.

Our Office views proactive community engagement and improved transparency as crucial elements of effective transmission planning and an equitable transition. In particular, we welcome the Review's recognition of the governance gaps in the Electricity Infrastructure Investment Act regarding effective community and consumer engagement. Clearly, current transparency and engagement obligations must be enhanced if we are to increase understanding and trust in the system, while also improving practical outcomes for electricity consumers, local communities and other affected stakeholders in NSW.

The Options Paper has categorised the issues identified with current transmission planning arrangements in NSW into five themes: allocation of roles and responsibilities; planning reports; interaction between the NSW and national frameworks; planning for system security services, distribution networks and the needs of customers; and governance.

In this submission, we have chosen to provide some observations about the governance theme as it relates most closely to our work on best practice and community engagement.

Governance options to improve community engagement and enhance transparency:

All the options identified by the Review will help to improve consumer and community engagement and enhance transparency to some extent, noting that these options are *not* mutually exclusive. After reviewing these options, what I regard as most important to see are stronger requirements for EnergyCo to engage actively and empathetically with electricity consumers or consumer representatives on a regional basis, and particularly with local communities potentially affected by an REZ Network Infrastructure Projects or Priority Transmission Infrastructure Projects.

In-principle, the proposal to establish and fund a Consumer and Community Panel (or separate panels) as a way of complementing existing engagement practices and mechanisms undertaken by Roadmap bodies has merit – and I would be happy to discuss this specific proposal as it is developed further. Having this consultation *prior* to decision-making regarding REZ declarations is also a preferable approach. Requiring the Panel to prepare and publish a report that the decision maker must have regard to when making decisions can also be viewed as complementary to options E.2 and E.3, and could improve transparency within the transmission planning process.

Similarly, the proposed requirement for EnergyCo and AEMO Services to publish and publicly consult on drafts of key decisions is a sensible one. The energy transition relies on respectful relationships and trust in the system, and explaining how feedback is incorporated into decision making processes is a positive initiative to increase the level of transparency and community understanding.

Energy transition discussions have often paid insufficient attention to local and regional context, and the economic and cultural specificities shaping local identities. Identifying place-specific impacts within each REZ arguably justifies the development of specific stakeholder engagement plans for each REZ in addition to the publication of a general engagement plan. More meaningful community and stakeholder engagement would also benefit from the retention of suitable staff, potentially requiring changes to EnergyCo's governance and funding arrangements.

Thank you again for the opportunity to share my observations and reflections regarding transmission planning arrangements in NSW and this Options Paper. I would be delighted to discuss these matters with you and your colleagues in further detail, and would welcome the opportunity to have a one-on-one meeting following the release of the Interim Report and draft recommendations.

If you have any further questions in relation to these comments or require additional information, please contact us via email at aeic@aeic.gov.au or on 1800 656 395.

Yours sincerely,

TONY MAHAR
AUSTRALIAN ENERGY INFRASTRUCTURE COMMISSIONER