

5 November 2021

TransGrid Regulation Team
regulatory.consultation@transgrid.com.au

Submitted electronically.



Dear TransGrid,

PADR Summary: Improving stability in south-western NSW project

The Public Interest Advocacy Centre (PIAC) is a leading social justice law and policy centre. Established in 1982, we are an independent, non-profit organisation that works with people and communities who are marginalised and facing disadvantage. PIAC builds a fairer, stronger society by helping to change laws, policies and practices that cause injustice and inequality. The Energy and Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in NSW. The program develops policy and advocates in the interests of low-income and other residential consumers in the NSW energy and water markets.

PIAC rejects TransGrid's proposal under current cost recovery arrangements, which would require consumers to pay for the proposed network upgrades.

Generation businesses, not consumers, are the primary beneficiaries of the upgrades proposed. TransGrid should seek funding from those generation businesses if it considers the upgrades have merit. The revenue benefit for generators will be greater than the wholesale market benefits for consumers, and if generators are unwilling to fund the upgrades this casts doubt on TransGrid's estimates of costs and benefits.

PIAC is concerned that TransGrid's estimates of the net benefits to consumers are overstated. TransGrid has persistently and significantly underestimated costs and, in PIAC's view, exaggerated the benefits of its proposed major transmission projects.

Please feel free to contact me should you wish to discuss these matters further.

Yours sincerely

Craig Memery
Program Director, Energy and Water Consumers' Advocacy Program
Public Interest Advocacy Centre

Direct phone: 0412 223 203
E-mail: cmemery@piac.asn.au

Level 5, 175 Liverpool St
Sydney NSW 2000
Phone: 61 2 8898 6500
Fax: 61 2 8898 6555
www.piac.asn.au
ABN: 77 002 773 524