

RE-Alliance feedback to Social Licence for Electricity Transmission Projects Directions Paper

- RE-Alliance is active in many communities hosting renewable generation and transmission projects and provided some comments on the draft Directions Paper as part of an ongoing dialogue with the AER on community engagement and social licence issues.
- How does the AER propose to address ongoing monitoring and accountability? Is there a role for compliance and enforcement - for example - if the national guidelines being developed by DCCEE are adopted for projects within the AER's remit? Is there a place for the AER to aggregate and publicly reporting on accountability? This could improve transparency on what transmission businesses commit to doing, what they spend on it and what is done. It may also help to set the expectation in a similar way to what is suggested in the incentives review.
- The AER's role is crucial in considering (and reporting on) how any expenditure recovered from consumers interacts with public funding to ensure there is not double dipping.
- There is more that can be contributed around First Nations engagement and actions. The First Nations Clean Energy Guideline is out for consultation and the Clean Energy Council is developing First Nations community engagement guidelines. These are additional reference points that the AER could refer to in its final Directions Paper
- Early stage consultation is being done by an increasing number of entities that are not transmission businesses (e.g. VicGrid or EnergyCo). The AER will need to consider how this Directions Paper, the new DCCEE social licence and benefit sharing guidelines and future AER guidance interact. The main issue here is a gap between the agency and then a transmission business taking over the engagement as the project moves into a new phase. Would the AER's directions paper, or guidance, influence how these earlier stage entities manage and coordinate community engagement on transmission routes and projects?
- *Cost recovery* – it is good that there is a pathway for this issue, but will the AER require transmission businesses to test all proposals with consumer groups as well? We understand that the AER intends to look at the overall program rather than the specific actions to avoid it becoming a shopping list.
- How will this expenditure interact with transmission business expenditure on unregulated elements? For example, some businesses have telecommunication revenue streams – is there a ring-fencing issue?