

Marinus Link - Stage 1, Part B (Construction costs)

Electricity transmission determination 2025–30

Questions on Cost Uncertainty

1) What level of cost certainty is appropriate before updated RIT-T assessments are finalised?

The only appropriate level of cost certainty before finalising the Regulatory Investment Test for Transmission (RIT-T) is total and unambiguous certainty.

Anything less, particularly in a project of this scale and cost burden, represents a dereliction of duty.

Yet MLPL and the AER proceed shamelessly with tendered costs that are still only AACE Class 2 — and worse, untendered components remain Class 3 or below.

This is unacceptable.

Finalising the RIT-T while enormous sums remain undefined is like authorising a blank cheque on consumers' backs — economic malpractice dressed up as policy.

2) If there are residual cost uncertainties at the time MLPL revisits the RIT-T analysis, how should this analysis account for the uncertainties?

The analysis should not merely "account" for uncertainties — it should halt entirely until those uncertainties are resolved.

The fact that the AER entertains the idea of proceeding under these circumstances exposes the fundamental rot in the regulatory regime.

At a minimum, MLPL must undertake extensive sensitivity analysis with worst-case scenarios, stress-testing all variables to account for ballooning costs — not conveniently buried behind risk allowances and "Balance of Works" ambiguity.

Questions on Cable 2 Contingent Project

3) What are your views on the issues raised with respect to the contingent project approach or trigger events?

Cable 2's contingent status is a fig leaf for inevitable cost escalation and regulatory sleight-of-hand.

The 'trigger' is practically designed to be self-fulfilling. It's another way for MLPL to delay scrutiny, inflate sunk costs, and pressure stakeholders into funding a second cable to "protect the value of the first" — classic infrastructure entrapment. The contingent project approach is nothing more than a Trojan Horse — dressed up in regulatory language to disguise a deliberate obfuscation of total project costs and an assault on accountability.

Questions on Consumer Engagement

4) In what ways has MLPL's engagement on key elements of the proposal been genuine?

It hasn't. MLPL's so-called "consumer engagement" is a theatre of consultation, devoid of substance.

The only visible feedback noted is from a Consumer Advisory Panel on the CESS — hardly evidence of widespread or influential engagement.

This isn't consultation; it's box-ticking propaganda.

A bogus 'Consumer Advisory Panel' is being used as a pretence for Social Licence - wrongly used to justify decisions already made behind closed doors - when NO CONSENT whatsoever has ever been gained from the public - everyday electricity consumers & impacted rural host victims.

5) To what extent do you consider consumers were able to influence the topics MLPL engaged on?

Everyday consumers had no influence at all.

Topics were predetermined, sanitised, and deliberately omitted to minimise dissent.

MLPL and AER's failure to incorporate genuine consumer direction shows contempt for the democratic foundations of infrastructure planning.

It's regulatory totalitarianism.

6) What key themes would you like to see MLPL engage on?

- Total project affordability for massive seabed and land disruption and all cumulative 'Renewable' associated cost impacts.

- Full life-cycle, cumulative emissions and ecocidal impacts.

- Associated actual Capacity Factors, Wind Droughts, Genuine & Workable Toxic Waste Solutions.

- National Security Risks over 345 km of exposed infrastructure as well as for all associated RenewaBULL, CCP reliant, unethical Slave Labour produced infrastructure.

Social Licence to operate, which this project catastrophically lacks.

- Sovereign alternatives to Marinus Link including far superior, reliable, affordable, efficient, secure, independent, 24/7 Australian Coal power & a safe Nuclear power future with minimal environmental footprint- that works on demand - NO toxic, incapable LITHIUM BATTERY BOMBS, pathetic, weather dependent, intermittent, energy poverty RenewaBULLs or unnecessary Interconnector Transmission Line Nightmare needed.

All factually accounted for by independent, reputable, peer reviewed experts.

Questions on Forecast Capital Expenditure

7) What are your views on the proposed capital expenditure...?

The proposed capital expenditure of \$3.53 billion is scandalously inflated, especially when half of

it is untendered and opaque. It lacks:

Prudence: There is no justification for laying conduits for Cable 2 under the false pretense of "future proofing" — a tactic to pre-commit funds for a non-approved project.

Efficiency: Massive risk contingencies baked into vague "Balance of Works" buckets suggest either inept forecasting or a cover for future overruns.

Credibility: A proposal this incomplete, vague and unverified should never be approved for RAB inclusion.

Yet the AER appears ready to rubber-stamp it.

This is the abuse of a regulatory monopoly to impose unaffordable energy infrastructure, distorting electricity markets and penalising the very consumers it pretends to serve.

Questions on Incentive Schemes

8) How should the CESS apply in the 2025–30 period?

It should not apply at all — not in its current form.

The entire CESS model is fundamentally incompatible with a project that has front-loaded all tendering and procurement before the regulatory control period even begins.

What's being "incentivised" here? It's a zombie scheme, maintained for the optics of regulatory performance but offering no functional accountability.

9) What are your views on the 5/95 cost sharing ratio proposed by MLPL?

A 5/95 cost sharing ratio is a mockery of risk sharing. It leaves MLPL virtually insulated from cost increases while consumers pick up the tab.

It's the worst form of moral hazard — a blank cheque for inefficiency, excuses, and overruns.

There is zero incentive for MLPL to control costs when 95% of the pain lands on consumers.

10) What specific factors should be considered in CESS application?

Marinus Link is a:

- Politicised project.
- Reliant on Unethical, Insecure, CCP Produced, Pathetic, Weather-dependent, Intermittent, Astronomically Costly, Toxic Contaminating/Polluting Wind/Solar Generators & Filthy Fire Hazardous BESS Bombs.
- Critical Energy Infrastructure Cyber Security Disaster.
- Ideologically Driven, Impractical, Experimental Gamble.

These factors all scream for exclusion from any standard CESS framework.

If anything, this project warrants extraordinary INDEPENDENT EXPERT SCRUTINY and SCRAPPING - not incentive candy from complicit, predatory Regulators who persistently fudge the facts.

Questions on Pass Throughs

11) What is the case for including or not including the additional pass throughs proposed by MLPL?

There is no legitimate case for these pass throughs.

Every proposed "unavoidable" cost - from contract variations to insolvency - is entirely foreseeable and manageable by competent project governance.

These pass throughs are risk-dumping mechanisms, engineered to transfer every shred of commercial risk onto consumers while rewarding MLPL with guaranteed returns.

12) How could the unavoidable contract variation pass through affect incentives?

It destroys them.

If MLPL knows it can outsource every cost blowout to the public via a pass through, why would it even pretend to manage risk, quality, or procurement rigorously?

This is a recipe for systemic inefficiency and contractor exploitation.

13) How could the proposed contractor insolvency pass through impact cost management incentives?

It eliminates them entirely.

MLPL will have no motivation to vet contractor stability or negotiate favorable terms if insolvency risk is socialised.

It creates a perverse incentive for engaging high-risk, low-cost bidders to meet procurement optics, then blame "market conditions" when they collapse.

This entire proposal - from RIT-T abuse to regulatory rubber-stamping - is a monumental policy failure.

Marinus Link is:

Ecocidal

Unreliable

Intermittent

Unaffordable

Energy-depriving

It defies the National Electricity Law Objective, violates all the Principles of Ecologically Sustainable Development, Wrecks Intergenerational Equity and makes a mockery of Engineering Facts, Scientific Rigour, Integrity and Ethics.

Marinus Link plan is a FISCAL BLACK HOLE.

'ECONOMIC LICENCE HAS BEEN FORGED.'

AER's supposed "evidence of prudence" is non-existent.

Their claim of "alignment with risk standards" is laughable. And their notion of "genuine consumer engagement" is Orwellian in its dishonesty.

This is not regulation. It is regulatory complicity in the greatest energy misallocation in Australian history - all while sleepwalking into national security compromise and sovereign risk.

An Immediate Moratorium is essential as well as a Royal Commission into the whole RenewaBULL Energy and Interconnector-Transmission Line Nightmare - including but not limited to: Energy Policy Orchestrators, the ISP, AEMO, AER, AEMC, Climate Change Authority, NEM Expert Panel, CEC, CEFC, Smart Energy Council, TransGrid, EnergyCo, Consumer Trustee - AEMO Services, TCV, CSIRO, etc. with multiple resignations required.

A newly established, independent, reputable, expert Regulatory body is absolutely essential - with no links to Vested Interests.

It's absolutely clear that the Regulator's ISP is grossly flawed - with NO ENGINEERING FACTS, NO SCIENTIFIC RIGOUR, NO INTEGRITY, NO ETHICS, NO SOCIAL LICENCE, NO RELIABILITY, NO SECURITY, NO AFFORDABILITY.

"ECONOMIC LICENCE HAS BEEN FORGED!"

The ISP is:-

- Not Fit For Purpose
- NOT Independent
- An Unmitigated Disaster
- Is Fatally Compromised
- IS DEAD & BURIED!

Marinus Link & its ISP basis is a monumental disaster on obvious National Security grounds alone - fulfilling China's Energy Dream NOT AUSTRALIA's.

"Carbon dioxide reduction only make sense for those it (China) wishes to harm & supplant." -

Patricia Adams

<https://www.thegwpf.org/content/uploads/2021/12/Adams-Chinas-Energy-Dream.pdf>

****It's Kean's fault - Matt Kean!**

There is a pent up dam of pressure - so much more around the corner coming....

We're just starting to see the very tip of the iceberg! - Aidan Morrison - 13/3/2025

<https://www.skynews.com.au/opinion/costs-flow-through-to-consumers-from-labors-renewable-energy-crisis/video/117ea7f80173e5818d94906f52d5fd60>

****"The idea that adding more & more renewable energy to the grid pushes power prices down has been comprehensively dismissed."** Aidan Morrison - 10/2/25

4:48 minutes

<https://www.skynews.com.au/opinion/peta-credlin/governments-insistence-on-renewables-amid-soaring-power-prices-lashed/video/86bd230860f5514d1e587239c6b913ab>

****Fresh pressure on Chris Bowen + Matt Kean 🗑️ - Ben Fordham Live - Aidan Morrison - 07/02/25**

8 minutes

<https://omny.fm/shows/ben-fordham-full-show/saturday-fresh-pressure-on-chris-bowen-matt-kean>

[<https://omny.fm/shows/ben-fordham-full-show/friday-show-7th-february>]

****AEMO was not "trying to find the cheapest replacement for coal" since its Integrated Systems Plan (ISP) must be based on the current government's policy.** - Aidan Morrison - 16/1/25

7 minutes

"Matt Kean looks like he's lying to Parliament in that case, because the statements he's made... that the market operator's ISP is trying to find the cheapest replacement for coal; that is absolutely false," he said.

"What's become absolutely, unequivocally clear is that the market operators Integrated System Plan is merely an instrument to achieve government policies.

It does not allow government policies to be compared to any other alternative.

"So this idea that this baseline is somehow tested and compared to other alternatives - like more coal and gas - is utterly false."

<https://www.skynews.com.au/business/energy/utterly-false-energy-expert-unleashes-on-climate-change-authority-head-matt-kean-and-market-regulator-beholden-to-government/news-story/a68147f24f47c99c1a868640f6ab7b64>

From

Lynette Lablack

