Dr Kris Funston
Executive General Manager, Network Regulation
Australian Energy Regulator

Objection to Supplementary Draft Decision – Marinus Link Stage 1, Part B

Dear Dr Funston,
We write to express our ongoing outrage and strong condemnation of the AER's whole Marinus Link concept and this Supplementary Draft Decision on Marinus Link Stage 1, Part B (Construction Costs).

The decision represents an ideologically driven, exorbitantly expensive, and environmentally destructive policy masquerading as responsible energy regulation, while imposing massive costs on Australian consumers and taxpayers for nothing but a failed system and seriously detrimental outcomes from which the Government is failing its primary role of protecting its citizens.

The AER's justification for approving $3.316 billion in capital expenditure—largely based on speculative risk allowances, ideological assumptions about 'renewable' energy, and reliance on proponent-driven models—fails on multiple grounds:

Fake Green Ideology Over Evidence-Based Planning:
The decision prioritises weather-dependent, intermittent 'renewable' energy infrastructure that is neither reliable nor economically justified.
The so-called 'Battery of the Nation' project is a green fantasy, heavily subsidised at the expense of Tasmanian and mainland Australian energy consumers.
As Paul Miskelly warned more than a decade ago in 'Wind Farms in Eastern Australia – Recent Lessons' (2012), such infrastructure has repeatedly failed to deliver promised outcomes.
It is irrational to force Australians to fund a grid that will fail under normal conditions.

Astronomically Inflated Costs:
The AER's partial acceptance of MLPL's risk allowance (even after reducing it by 45%) still exposes consumers to hundreds of millions in speculative, upwardly biased costs.
Monte Carlo simulations and three-point estimates are inherently subjective, and the AER has blindly accepted complex risk modelling without adequate skepticism. These inflated costs directly harm ordinary Australians and serve the financial interests of private contractors.

Disregard for Energy Security and Reliability:
By prioritising intermittent 'renewables' over proven, dispatchable sources, the AER's decision undermines energy security, public health and safety, food security, protection of our biodiversity, economic prosperity/productivity and national security.

Tasmania is being sacrificed for a “renewable” agenda that will fail in peak demand scenarios, leaving the grid vulnerable and taxpayers suffering, potentially dying and liable for massive costs.

Opaque and Misleading Process:
The AER relies on consultants (EMCa, Aurecon) and proprietary modelling that is inaccessible to public scrutiny, allowing questionable assumptions to masquerade as expert analysis.
This lack of transparency fails the very consumer protections the AER claims to uphold.

Regulatory Inconsistency and Ideological Bias:
While the AER pursues consumer protection in cases like TransGrid’s alleged rule breaches, it simultaneously permits ideologically motivated expenditures on Marinus Link that will saddle consumers with enormous costs for a project that is technologically and economically dubious.
This is regulatory hypocrisy at a systemic level.

Urgent Recommendations:
Implement an immediate moratorium on Marinus Link Stage 1 expenditure, and on all large-scale industrialised solar, wind, and battery projects as well as all other Interconnectors - including ElectraNet’s 46.56% CCP controlled Project Energy Connect, VNI West and HUMELINK, etc. that are all designed to sabotage our nation for the CCP prioritising, global controlling, ASEAN POWER GRID AGENDA.
Commission a comprehensive independent audit of all risk allowances, contracts, and procurement processes, with full transparency to consumers and taxpayers and also to determine who is subject to the CCP’s National Intelligence Law ie. Who has no allegiance Australia.

Re-prioritise energy investment toward dispatchable, reliable sources:
Coal, nuclear, and hydro with minimal environmental footprint, ensuring energy security, economic productivity, and public health.
Investigate any undue influence from foreign interests or CCP-linked entities in the promotion and regulation of these projects.

The current Supplementary Draft Decision is unsupportable on economic, technical, and environmental grounds.
Its continuation threatens Tasmania, Victorian, and broader Australian energy consumers with unnecessary and bankruptingly costly financial burdens, grid instability, and environmental degradation—all for the sake of a politically motivated fake green agenda.

As **UNETHICAL, CCP RELIANT, ENERGY POVERTY RenewaBULLs ARE THE ASBESTOS OF THE FUTURE**, we urge the AER to reconsider this decision in its entirety and to adopt a consumer-first, evidence-based approach to Australia’s energy future - guided by genuinely independent

and reputable Electrical Engineering Experts like Paul Miskelly.

REFERENCE:

PAUL MISKELLY: "Wind Farms in Eastern Australia - Recent Lessons." 2012
The link is:
https://journals.sagepub.com/doi/reader/10.1260/0958-305X.23.8.1233

ABSTRACT

Academic discussion continues as to whether a fleet of grid-connected wind farms, widely dispersed across a single grid network, can provide a reliable electricity supply. One opinion is that wide geographical dispersion of wind farms provides sufficient smoothing of the intermittent and highly variable output of individual wind farms enabling the wind farm fleet to provide for base load demand.
In an examination of the 5-minute time-averaged wind farm operational data for 21 large wind farms connected to the eastern Australian grid - geographically the large most widely dispersed single interconnected grid in the world (AER, [1]) - this paper challenges that opinion.

The findings also suggest that the connection of such a wind farm fleet, even one that is widely dispersed, poses significant security and reliability concerns to the eastern Australian grid. These findings have similar implications for the impact of wind farms on the security of electricity grids worldwide.

Keywords:
Wind, Electricity, Intermittency, Geographic Dispersion, Smoothing, Grid Security.

CONCLUSION

Engineers are required to do more than merely analyse and report on natural phenomena. They are required to create practical solutions to real world problems.
In doing so they must test and design systems ensuring that they have addressed the worst case scenarios.
As a result, they may not concentrate merely on average values.
With these requirements firmly in mind, to the electrical engineer, a careful scrutiny of the available wind farm operational data shows that, on the eastern Australian grid, it is not possible for wind energy ever to displace dispatchable, reliable generation supplying the base load demand.
In this regard, an examination of the graphs comprising Figure 3 clearly indicates that the proposal by some Australian policymakers to replace major coal-fired power stations with a fleet of wind farms is not technically achievable.

Additionally, the analysis shows that further increased wind penetration, even if spread

evenly across the eastern Australian grid, will result in an increasing contribution to grid instability, potentially making wind energy an increasing threat to grid operational security and reliability. To continue a policy strategy to increase wind penetration across the eastern Australian grid, to seek to meet a target of some 20% installed capacity, as has already been achieved in South Australia, (with the presumption that wind may thereby meet 20% of base load requirements), has the potential to be a dangerous strategy.
To address the increased instability due to wind, a fleet of fast-acting OCGT (open cycle gas turbine) generation plant may well be required to back up wind's intermittency.
The use of significantly greater proportion of this form of generation, rather than the more thermally-efficient CCGT, (combined cycle gas turbine) in the gas-fired generation plant mix may lead, seemingly
paradoxically, to both higher gas consumption and higher GHG emissions from the OCGT/ CCGT generation mix than if wind generation was not included in the
generation portfolio.

As the eastern Australian grid is:
•The world's most geographically dispersed single interconnected grid
•as the present wind farm fleet is dispersed across it at its widest portion in the east-west direction, that is, in the direction of the prevailing mesoscale atmospheric circulation
•and that this fleet also occupies a significant region in the north-south direction, these conclusions are significant for grids worldwide."

Yours Sincerely,
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