

AER Consults on Revised 2026–31 Regulatory Proposals from Victorian Electricity Distributors

1. The AER Has Abandoned Engineering Reality

The Australian Energy Regulator's draft decisions and its continued acceptance of the DNSPs' revised proposals would continue to represent a catastrophic failure of engineering judgment, scientific rigor, ethical governance, and national responsibility.

Despite repeated assurances that the AER exists to ensure consumers are "better off, now and in the future," the practical outcome of AER decision-making is the exact opposite:

Higher prices

Lower reliability

Increased blackout risk

Massive environmental vandalism

Loss of national energy sovereignty

Deepening dependence on hostile foreign supply chains

This is not regulation in the long-term interests of consumers.

It is ideological compliance dressed up as economic oversight.

2. The AER's Core Premise Is False

The AER's Executive Summary repeatedly asserts that its decisions are guided by:

Efficiency

Reliability

Security

Affordability

Emissions reduction

None of these claims withstand scrutiny when tested against physical reality rather than political narrative.

The AER remains wedded to a fatally flawed assumption:

That increasing penetration of intermittent solar, wind, and battery infrastructure produces a cheaper, safer, and more reliable electricity system.

This proposition has been comprehensively falsified—technically, economically, and empirically.

The idea that renewables "push prices down" has been dismantled by real-world outcomes across Australia and internationally.

The AER's refusal to acknowledge this is not ignorance; it is institutional denial.

3. Engineering Reality Has Been Ignored for Over a Decade

As early as 2012, Australian Electrical Engineering Expert Paul Miskelly warned—using real operational data from the NEM—that large-scale wind integration:

Cannot provide base load

Cannot be smoothed by geographic dispersion

Increases grid instability

Necessitates inefficient fast-acting gas backup

Increases total fuel use and emissions

Paul Miskelly's peer-reviewed analysis of 21 widely dispersed wind farms on the eastern Australian grid demonstrated conclusively that:

"It is not possible for wind energy ever to displace dispatchable, reliable generation supplying base load demand."

These warnings were not speculative.

They were based on 5-minute operational data from the world's most geographically dispersed interconnected grid.

Yet the AER continues to base regulatory decisions on the same disproven assumptions—now further entrenched in the Integrated System Plan, which is:

Not fit for purpose

Not independent

Economically fraudulent

Technically incoherent

Already contradicted by observed outcomes

The ISP is not a planning document.

It is a political artifact.

4. The Renewable Transition Is an Engineering Fraud

The DNSPs themselves openly acknowledge that intermittent generation creates:

Grid congestion

Voltage instability

Frequency control problems

Power quality degradation

Increased network expenditure

Forced consumer participation

Yet the AER continues to approve expenditure whose sole purpose is to compensate for the deficiencies of weather-dependent generation.

This is not "efficient investment."

It is systemic patch-up of a design that does not work.

A system that requires:

Overbuild

Duplication

Massive storage

A 15+ GW methane-burning gas backbone

...is not a clean, cheap, or resilient system.

It is a fragile, over-engineered fantasy.

[Reference: "It has the feel of an Icarus moment: a civilisation convinced it can defy gravity, only to discover the wax melts in real sunlight."

5. Emissions Claims Are Scientifically Dishonest

The AER's repeated references to emissions reduction are selective and misleading.

Facts the AER continues to ignore:

HELE coal materially reduces emissions per MWh compared to legacy coal

Nuclear power is among the lowest lifecycle-emission energy sources on Earth

Solar, wind, and batteries have:

High embodied emissions

Toxic materials

No credible end-of-life waste solution

Enormous land and environmental footprints

The so-called "clean energy transition" is entirely dependent on:

Chinese mining

Chinese processing

Chinese manufacturing

Chinese logistics

Chinese labour practices

This includes documented supply chains involving forced and slave labour.

Calling this "ethical" or "clean" is an insult to science and morality.

6. Renewables Are the Asbestos of the Future

History will judge industrial-scale solar panels, wind turbine blades, and battery systems exactly as it judged asbestos:

Toxic

Persistent

Poorly regulated

Dumped into the environment

Public health disasters in waiting

The AER and associated regulators are sleep-walking into a future liability crisis, deliberately ignoring the absence of recycling pathways, toxic contamination risks, and long-term health consequences.

This is regulatory negligence.

7. Consumer Consent Has Been Abandoned

Consumers are now:

Forced into electrification

Forced to subsidise grid instability

Forced to surrender control of their solar and batteries

Treated as grid assets rather than customers

This is happening:

Without consent

Without genuine social licence

Without transparency

This is not an electricity service.

This is coerced participation in a failing system.

8. Bushfire Risk and System Fragility

The AER's proposals are grotesquely irresponsible in bushfire-prone Victoria.

A grid dominated by:

Weather-dependent generation

Transmission-heavy architecture

Fragile electronics

Distributed ignition sources

...is the worst possible configuration for a fire-ravaged state.

Coal and nuclear power stations do not shut down when:

The wind stops

The sun sets

Smoke covers the sky

Transmission corridors burn

The AER has not merely ignored this risk—it has institutionalised it.

9. National Security Has Been Entirely Ignored

The ownership structure of Victorian DNSPs raises serious national security concerns.

Entities subject to China's National Intelligence Law hold controlling interests in networks critical to Australia's economic and social functioning.

This is not hypothetical.

This is black-letter Chinese law.

The AER's silence on this issue is indefensible.

An energy system dependent on:

Hostile foreign components

Foreign-controlled network operators

Foreign strategic objectives

...is not energy security.

It is strategic self-harm.

10. Conclusion – The AER Has Lost Its Mandate

The AER claims to act in the long-term interests of consumers.

The evidence demonstrates the opposite.

By:

Ignoring engineering reality

Disregarding scientific evidence

Endorsing ideological planning

Enabling foreign influence

Forcing consumer compliance

...the AER has forged an economic licence

Australia does not need more grid patch-ups to accommodate failure.

Australia needs:

Reliable 24/7 generation

Sovereign fuel sources

Proven engineering

Honest accounting

Coal and nuclear power

Until the AER acknowledges this reality, its decisions will continue to damage consumers,

weaken national resilience, and betray the very objectives it claims to uphold.