

20 February 2026

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**RE: ElectraNet Northern Transmission Project Stage 1b- Early Works Contingent Project**

The South Australian Council of Social Service (SACOSS) is the peak body for non-government health and community services in South Australia with a mission to advocate for the interests of people on low incomes or experiencing disadvantaged across the state. We thank the Australian Energy Regulator (AER) for the opportunity to provide a submission on *ElectraNet's Northern Transmission (NTx) Project stage 1b early works contingent project application*, dated 21 January 2026 (the Application).

As noted in the Application, there is significant uncertainty around whether the NTx Project will be identified as actionable in AEMO's 2026 Integrated System Plan (2026 ISP). Given this uncertainty, and the current energy affordability crisis in South Australia,<sup>1</sup> SACOSS is urging the AER to robustly scrutinise the prudence and reasonableness of the categories and costs for additional early works, and to ensure South Australian energy consumers pay no more than is necessary.

In June 2025, the AER approved \$45.7m in 'early works' expenditure for Project NTx, with \$13.3m currently remaining unspent. This Application has identified \$42.8m in costs to continue with early works, and is therefore seeking additional funding of \$29.5m (just under the materiality threshold) for the continuation of certain activities. Further, ElectraNet will be making an additional application for early works after the publication of the PADR in July 2026, this points to a small window (less than six months) within which ElectraNet is proposing to spend \$42.8m on a range of activities (including land acquisition) to support the project.

Should this application be approved, South Australian energy consumers will be paying \$75.2m for around 12 months of early works associated with a project that remains uncertain.

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<sup>1</sup> SACOSS, [Ministerial Briefing on Energy 2024/25](#), August 2025 pp. 7-15

SACOSS questions whether it is reasonable for consumers to bear this level of cost and risk, and is seeking the AER consider whether the unspent \$13.3m is adequate to continue with prudent early works associated with this project (community engagement activities) until after the publication of the PADR.

Speaking broadly, SACOSS is deeply concerned about the increasing inequity in the distribution of electricity costs across all elements of the price stack. Non-transparent retail trading practices and risk management strategies, as well as an increasingly volatile wholesale market and the future costs of the energy transition - including forecast transmission network expenditure, jurisdictional scheme costs and metering costs - all combine to place additional and increasing cost and risk burdens on consumers. Low-income / low-wealth households, renters and others unable to reduce grid consumption through access to distributed energy resources, disproportionately bear the burden of these costs.

It is therefore vital that decision-makers ensure consumers do not face unnecessary or unreasonable costs across all elements of the price stack, including transmission costs.

If you have any questions in relation to this submission, please contact Georgina Morris at [georgina@sacoss.org.au](mailto:georgina@sacoss.org.au) or 8305 4214.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'R Toohar', written in a cursive style.

**Dr Rebecca Toohar**  
Director of Policy and Advocacy  
South Australian Council of Social Service