



27 September 2023

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Chairperson
Australian Energy Market Commission
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Rule Change - Enhancing community engagement in transmission building

The draft rule clarifies that Transmission Network Services Providers (TNSPs) are required to engage with stakeholders, as part of preparatory activities, who are reasonably expected to be affected by the development of the actionable Integrated System Plan (ISP) project, future ISP project, or project within a REZ stage, including local landowners, local council, local community members and traditional owners. Consultation must be undertaken before the Regulatory Investment Test for Transmission (RIT-T) stage is complete.

There is no explicit reference to mining or exploration licence holders in the draft rule determination. However, mining and exploration licence holders should be included under the definition of 'stakeholders', provided they are reasonably expected to be affected by the development.

The MCA recommends the rule be amended to include the following definition (added *in italics*)

[2] 5.10.2 Definitions

In clause 5.10.2, in the definition of "preparatory activities", omit paragraph (e) and substitute:

(e) engagement with stakeholders who are reasonably expected to be affected by the development of the actionable ISP project, future ISP project, or project within a REZ stage (including local landowners, *mining, exploration and production licence holders*, local council, local community members and traditional owners) in accordance with the community engagement expectations.

[5] 5.15.1 Interested parties

After clause 5.15.1, insert:

(b) For the purpose of the regulatory investment test for transmission for an actionable ISP project, an interested party includes stakeholders who are reasonably expected to be affected by the development of the actionable ISP project (including local landowners, *mining, exploration and production licence holders*, local council, local community members and traditional owners).

These amendments will not only ensure that this critical sector is considered when planning transmission infrastructure, but also allow mining operations – which are traditionally very large consumers of energy – to meet the power needs of their facilities.

In October 2021 the MCA confirmed the industry's ambition to achieve net zero emissions by 2050, in support of the goals of the Paris Agreement.

As noted in multiple submissions, Australia's net-zero ambition can only be achieved through significant investment in technology. Member companies are proactively adopting or considering a range of existing and emerging technologies.

These energy generation technologies may be located adjacent to existing infrastructure or established in greenfield sites requiring significant transmission to deliver the energy to the user – notably as part of identified Renewable Energy Zones (REZs).

Noting the regional status of most mining sites, consultation with the sector regarding the timing and placements of transmission corridors will be critical for a successful future transition.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tania Constable', written in a cursive style.

TANIA CONSTABLE PSM
CHIEF EXECUTIVE OFFICER