



Ref. A5314718

27 September 2023

Alisa Toomey
Director
Australian Energy Market Commission
Level 15, 60 Castlereagh Street
Sydney NSW 2000

cc: Viashin Govender

Dear Ms Toomey,

ENHANCING COMMUNITY ENGAGEMENT IN TRANSMISSION BUILDING DRAFT DETERMINATION – REFERENCE ERC0357

Powerlink Queensland welcomes the opportunity to provide feedback on the Australian Energy Market Commission's (AEMC) Enhancing Community Engagement in Transmission Building Draft Determination (Draft Determination).

The AEMC considers that its Draft Determination seeks to guide and support Transmission Network Service Providers (TNSPs) to build social licence for transmission by enhancing community engagement for actionable and future Integrated System Plan (ISP) projects and Renewable Energy Zones (REZ). A key means by which it is intended to do this is to increase the certainty and consistency around TNSP's early engagement with communities. Among other things, this should help build more constructive relationships with community stakeholders and improve the timely delivery of electricity transmission infrastructure.

Powerlink understands that building and maintaining social licence is not only fundamental to why and how we engage in the normal course of business, it is fundamental to the success of the energy transformation. We therefore support the Draft Determination, and consider it reflects the increased focus on social licence and improved stakeholder engagement more broadly in the transmission sector. It also reflects the principles of good engagement.

Our Purpose

Powerlink's purpose is to connect Queenslanders to a world-class energy future, delivering electricity to more than five million Queenslanders and 253,000 businesses. We play an active role in the energy transformation by strategically planning the transmission network, guiding, and shaping the power system, and enabling opportunities as Queensland moves to a lower carbon future.

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Our commitment to social licence

We are committed to undertaking genuine and early engagement, listening to our communities and other stakeholders to better understand their needs and priorities. Our goal is to develop co-existence arrangements with landholders and seek to provide long-term benefits for the communities in which we operate. These arrangements have been developed to help support sustainable communities, assist in regional economic development, enhance community and social capacity, and build resilience in areas traversed by existing or future transmission infrastructure where we co-exist.

Our *Community Engagement Strategy*¹ underpins this focus on ensuring local benefits and community investment go hand in hand with delivering the new energy future for Queenslanders. This strategy sets out our community engagement planning approach and the principles we live up to – from operating and maintaining our existing network, through to planning and building the network of the future. Given our infrastructure is typically in service for up to 50-years, partnering with all of our host communities from Cairns down to the New South Wales border is important to building relationships based on respect and trust. Our commitments therein are consistent with those set out in the AEMC's Draft Determination.

We are also actively involved in and support several significant initiatives and collaborative works within the energy industry to improve stakeholder engagement and social licence. This includes development of The Energy Charter's *Landholder and Community Better Practice Engagement Guide (the Guide)* and *Better Practice Social Licence Guideline (the Guideline)*. We are also an active participant in the current community engagement reviews being undertaken by the Australian Energy Infrastructure Commissioner and the Department of Climate Change, Energy, the Environment and Water. For further context:

- The primary purpose of the Guide is to encourage better engagement and outcomes for landholders and communities. It was put together with the help of landholder and community representatives based on the collective experience across many energy projects. It was a collaboration between TNSPs, landholder representatives and other community stakeholders including the National Farmers Federation and Farmers Federation representatives from Queensland, NSW and Victoria, AgForce Queensland and Cotton Australia.
- The Guideline provides a checklist of actions and activities required to minimise impact and meet landholders' expectations, as well as activities transmission businesses should look to progress, align to and build on, to deliver shared value and build social licence. The Guideline was also a collaboration between a Community Outcomes Group made up of landholder and community representatives and TNSPs, including Powerlink.

Key Messages

Powerlink considers that the broad principles-based approach taken by the AEMC recognises the need for flexibility so that TNSPs can design and deliver stakeholder engagement activities that are tailored to the needs of their communities and stakeholders, as well as individual project circumstances. TNSPs need to engage in a way that is appropriate for the stage of an investment/project, the level of certainty in planning and delivery, and the different communities and environments within which TNSPs operate. This flexible approach is particularly important for preparatory works that, by their nature, are likely to have greater variability in project timing, design, and location and will require engagement and methods to evolve with the development.

Powerlink also broadly supports the proposed changes to the definition of interested parties, which is consistent with our current approach to stakeholder identification and engagement. For consistency with any existing state or territory statutory definitions of traditional owner or

¹ Published July 2021. See Powerlink website: [Community Engagement Strategy | Powerlink](#)

parties that can speak for country, Powerlink recommends the definition of traditional owner in the Rules refer to these established definitions.

We look forward to working with the AEMC as part of this Rule change process. If you have any questions in relation to this submission, please contact me by email at jenny.harris@powerlink.com.au.

Yours sincerely,



Jennifer Harris
General Manager Network Regulation