

26 September 2023

Viashin Govender
Australian Energy Market Commission
Submitted online

Dear Viashin

RE Enhancing community engagement in transmission building

TasNetworks welcomes the opportunity to contribute to the development of the 'Enhancing community engagement in transmission building' rule change. TasNetworks is the Tasmanian Transmission Network Service Provider and, among other things, is responsible for progressing and delivering the North West Transmission Development (**NWTD**), which is an integral part of Project Marinus – an actionable Integrated System Plan (**ISP**) project.

Community engagement is an essential component of transmission building and is especially paramount as more greenfield developments are required as part of the energy transition. We support community engagement expectations being contemporised in the National Electricity Rules in a way that aligns with communities' needs and provides sufficient flexibility for the individual circumstances in the relevant region and project. Involving stakeholders and the community in the development of our projects ensures we achieve the best outcomes possible.

TasNetworks has engaged closely with local communities in an ongoing manner with respect to the NWTD. The NWTD includes 240km of new and upgraded transmission lines and other energy infrastructure that will increase the capacity of Tasmania's electricity network. Stakeholder and community engagement for NWTD has been undertaken since 2019 to connect, inform, consult and collaborate with project stakeholders.

We support the intent of the Commission's decision to define and incorporate traditional owners into community engagement requirements, including incorporating traditional owners into the definition of interested parties that is applicable for the RIT-T for actionable ISP projects. TasNetworks has endeavoured to incorporate feedback from the Tasmanian Aboriginal community with respect to tower re-alignments and in project management of the NWTD to alert and advise of potential matters relevant and of interest to the Tasmanian Aboriginal community.

Further examples of community engagement undertaken by TasNetworks for the NWTB is detailed in Attachment 1. These examples demonstrate engagement activities as well as how engagement and feedback has meaningfully influenced the NWTB project.

TasNetworks supports Energy Networks Australia's submission and is generally supportive of the draft determination, particularly the added clarity with respect to engagement requirements and expectations.

TasNetworks encourages a principles-based approach to community engagement, recognising the unique circumstances within each region and community, and on the basis that too much prescription may inadvertently lead to either:

- important and necessary engagement being assessed as inefficient; and/or
- unnecessary or inefficient engagement being required.

While we are of the view that the draft determination broadly achieves a good balance, consistent with a principles-based approach, TasNetworks suggests specific reference to community benefits be removed from the rule changes, specifically that 'potential ways to deliver community benefits' is removed from the definition of community engagement expectations in draft clause 5.10.2.

Tools to deliver community benefits are important, valued highly by communities, and ought to be considered and incorporated at the appropriate time¹. However, it may not be necessarily efficient to consider ways to deliver community benefits for all project classifications (such as future ISP projects). Direct reference to this in the Rules may create expectations that are not necessarily efficient. Additional principle based guidance on stakeholder feedback, including ways to deliver community benefits, could be more appropriately considered in the Australian Energy Regulator's (AER's) guidelines – including applicability for the range of project classifications (actionable ISP projects, future ISP projects, or projects within a Renewable Energy Zone stage).

Acknowledging that social licence is not within the scope of this rule change process, TasNetworks also encourages a principles-based approach to social licence and notes the need to ensure fair and reasonable cost recovery of engagement and social licence activities. In this respect, we support the development of principled based AER guidance on community engagement and social licence activities.

Please contact [REDACTED] to discuss this submission.

Yours sincerely

[REDACTED]

Chantal Hopwood

[REDACTED]

¹ as demonstrated in TasNetworks' co-designed [Community Benefits Sharing Program](#) for the NWTB

Attachment 1: Community engagement activities for the NWTD

NWTD Route engagement (2019-2021)

TasNetworks consulted on a proposed route for the Staverton to Hampshire Hills section in late 2019 and early 2020. The proposed route was identified using detailed desktop studies undertaken by a team of experts in the fields of land use planning, power system engineering, economics, environment and cultural heritage.

Following the initial engagement process, TasNetworks received requests for changes to the proposed route from directly affected landowners, neighbours and community groups. TasNetworks met with interested parties to better understand their concerns and suggestions for realignment, and at their request, undertook further detailed investigations into variations to the proposed route, which aimed to address landowner and community concerns and suggestions.

The preferred route was released to the community in 2020. As part of the environment, planning and heritage assessment process, TasNetworks completed studies along the preferred route to understand any potential impacts the project may have on the environment and local communities. As a result of these field surveys some significant geological and ecological features were identified. Based on these findings, it was necessary to realign a section of the preferred route further to the south to avoid these areas.

TasNetworks commenced engagement on the Palmerston to Sheffield and Sheffield to Heybridge routes in November 2020. In addition to engaging directly with landowners, a series of drop in sessions were held in Cressy, Deloraine and Sheffield in November and December 2020.

In 2021, the remaining proposed routes for NWTD were released via a range of engagement activities between June and December to gather feedback on the proposed routes, understand what's important to community and what they wanted to know more about. This included 11 community information events, four online focus groups and one webinar.

Community awareness, landowner engagement and co-design (2021-2023)

Through an extensive co-design process with regional stakeholders, the paper *Capturing the Economic Development Opportunities from Renewable Energy Investments in North West Tasmania* was developed over the second half of 2021 and in early 2022.

The paper outlines the opportunities and challenges in pursuing economic development off the back of the significant pipeline of works proposed in the North-West region of Tasmania. A set of actions are identified for the regional stakeholders to pursue to enable and capture the economic opportunity for the region.

A number of these actions have been taken up by the members of the NWTD Stakeholder Liaison Group. Established in 2021, the Group is independently chaired with representation across key industry groups, peak bodies, education, skills and training sectors and state government organisations. They meet bi-monthly in Burnie and continue to be an important engagement forum for the project.

In 2022, we worked closely with stakeholders, community and landowners to collect feedback to inform the development of the project. Feedback collected during this phase has helped us develop a draft community benefit sharing program framework, supported our baseline environmental studies, and refined the design of the transmission lines.

Since August 2022, the placement of 42 towers have been adjusted along the proposed route as a result of engagement with landowners concerning their land use requirements such as locations of pivot irrigators. Another 20 towers have been moved due to technical findings as a result of field studies and some adjustments have also been made to the design of towers. Investigations and consultation with landowners continues to be undertaken throughout the transmission corridors as the project progresses.

During 2022, TasNetworks undertook a co-design process with the local community and stakeholders to develop, refine and finalise a proposed community benefits sharing program for NWTD. A key aspect of the process was the creation of a Youth Panel.

The Youth Panel was asked to draft a community benefits sharing framework to ensure the values, concerns and priorities of the local community, and in particular young people in North West Tasmania, were reflected in the benefits the program will deliver. The co-design process also involved local community members and stakeholders who were invited to share their feedback about the Youth Panel's draft framework.

Opportunities to provide feedback included community BBQ events, focus groups, stakeholder workshops, an online survey and during meetings of the NWTD Stakeholder Liaison Group. This collective feedback was considered by the Youth Panel before it delivered its final recommendations.