

28 September 2023  
Andrew Dyer  
Australian Energy Infrastructure Commissioner  
Submitted online

Dear Andrew Dyer

## Submission to the Community Engagement Review: Discussion Paper

The Australian Energy Market Commission (AEMC) welcomes the opportunity to make a submission to the Australian Energy Infrastructure Commissioner's community engagement review (the Review).

The AEMC considers that communities are critical partners in the energy transition. Building and maintaining trust between these stakeholders is necessary to deliver energy infrastructure projects efficiently and on time.<sup>1</sup> The Review is a valuable opportunity to make recommendations that support communities through the significant rollout of new energy infrastructure.<sup>2</sup>

The AEMC agrees with the Review identifying that poor community consultation and engagement could result in lengthy delays, less efficient outcomes, or failure to complete projects. These poor outcomes may result in greater costs to energy consumers.

The AEMC supports the Review focusing on the areas specified in the discussion paper and notes the intersection between these primary areas of focus and the AEMC's *Transmission planning and investment review* and *Enhancing community engagement in transmission building rule change* as well as work being undertaken by other entities.

Given these intersections and feedback from stakeholders, the AEMC welcomes recommendations that:

1. create clear, consistent, and transparent community engagement practices across energy infrastructure projects,
2. streamline community engagement and support communities' capacity to engage with energy infrastructure proponents,<sup>3</sup> and
3. facilitate information sharing between relevant stakeholders to support better land use planning to enable more targeted community engagement and improve planning outcomes.

The AEMC believes that considerations in these three key areas could result in recommendations under the Review that would complement and strengthen the AEMC's *Enhancing community engagement in transmission building rule change* and other work being undertaken by the Commonwealth, other energy market bodies, industry, and other entities, to support building social licence for energy infrastructure. We discuss these recommendations in more detail below.

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<sup>1</sup> The AEMC's *Transmission planning and investment review* (TPIR) identified that better, meaningful and early engagement with communities helps facilitate the timely and efficient delivery of major transmission infrastructure. See AEMC, *Transmission planning and investment review* (TPIR), Stage 2: final report, 27 October 2022, p. 27.

<sup>2</sup> A significant amount of new energy infrastructure including renewable energy generation, storage and transmission is required to transition the power system to net zero.

<sup>3</sup> Energy infrastructure proponents include generation and storage developers, TNSPs and other infrastructure planners.

Throughout the AEMC's work on community engagement and social licence building, we have engaged extensively with a broad range of stakeholders and attended various stakeholder forums and roundtables. Stakeholder feedback from these engagements has influenced the three key areas below that we have identified would be beneficial for the Review to further consider and is consistent with the terms of reference of the Review.

### **1. Creating clear, consistent, and transparent community engagement practices across energy infrastructure projects**

The *Enhancing community engagement in transmission building* rule change seeks to clarify that transmission network service providers (TNSPs) are required to engage with stakeholders who are reasonably expected to be affected by transmission projects, earlier in the transmission planning process. The rule change would also introduce community engagement expectations to create a consistent minimum standard of expectation across community engagement for transmission projects, that are made actionable by the Australian Energy Market Operator's (AEMO) Integrated System Plan (ISP).

The Commission recognises that major transmission projects, that are made actionable by the ISP, are not the only energy infrastructure that communities will be expected to engage with. Multiple proponents of new generation and other major transmission infrastructure are expected to engage with communities.

The AEMC notes that effective community engagement with affected stakeholders and expectations around how engagement should be undertaken is also the primary focus of the Review, but the Review is not limited to engagement on transmission infrastructure and is instead much broader. This enables the Review to create clear and consistent community engagement across energy infrastructure.

We consider that it is beneficial for recommendations made under the Review to create clear, consistent, and transparent community engagement practices across energy infrastructure projects that complement the community engagement requirements that would be introduced and further clarified by the rule change, if made.

### **2. Streamlining community engagement and supporting communities' capacity to engage with energy infrastructure proponents**

The Commission acknowledges that there are many energy infrastructure proponents who would engage with communities over the lifecycle of multiple projects. We understand that many of these communities are also being consulted about other non-energy related infrastructure projects. This may create a high risk of engagement fatigue among communities.

We have heard from stakeholders at various forums and roundtables that it is beneficial for community engagement across energy infrastructure to be streamlined to support communities' capacity to engage with multiple projects over time. We consider that it is important for communities to have tools that help communities better engage with infrastructure proponents. For example, tools that help communities better access and understand information or tools that create a clear pathway for communities to provide input or raise concerns.

Recommendations that streamline community engagement and provide tools that support communities to engage with energy infrastructure proponents would complement the *Enhancing community engagement in transmission building* rule change by helping manage the risk of community fatigue in relation to communities' earlier engagement with TNSPs on ISP projects.

### **3. Facilitate information sharing between relevant stakeholders to support better land use planning which enables more targeted community engagement**

The Commission acknowledges landowners, traditional owners and local communities that may host energy infrastructure have different interests and concerns, and different relationships with their lands. It may therefore be beneficial for energy infrastructure proponents to undertake more targeted engagement with communities based on their different interests, concerns and various land uses.

Effective land use mapping can be an effective feature of the planning process which helps infrastructure proponents understand the potential economic, environmental, and social costs associated with a particular project. For example, this can help identify whether a potential transmission corridor or project site may impact prime agricultural land or areas of cultural significance or identify land that hosts significant biodiversity and other natural resources.

The Commission considers that effective land use mapping is partly dependent on access to information resources across different stakeholder groups and entities. We consider that it is beneficial for the Review to consider whether there are any barriers to information and knowledge sharing between infrastructure planners and other entities that can be addressed.

The Commission welcomes recommendations that facilitate greater information and knowledge sharing to enable more effective land use mapping and better planning of infrastructure corridors or sites. This complements the *Enhancing community engagement in transmission building* rule change, if made, by providing TNSPs with better information on project options to undertake more targeted community engagement.

Please contact Viashin Govender for inquiries relating to this submission:  
[viashin.govender@aemc.gov.au](mailto:viashin.govender@aemc.gov.au)

Yours sincerely

A handwritten signature in grey ink, appearing to read 'Anna Collyer', written in a cursive style.

Anna Collyer  
Chair, Australian Energy Market Commission