

Feedback Submission

Re: Draft Victorian Transmission Plan Guidelines – August 2024

Executive Summary

Community Power Agency thanks the Victorian Government for the opportunity to provide feedback on the [Draft Victorian Transmission Plan Guidelines](#) ('Draft VTP Guidelines').

We commend the Victorian Government for undertaking a long-term, strategic planning process for renewable energy infrastructure and transmission development in Victoria. The strong commitment to consulting with communities and partnering with First Peoples in the Draft VTP Guidelines is a positive step toward maximising the benefits of the energy transition, and minimising negative impacts on communities.

However, there are critical areas where the Draft VTP Guidelines could be strengthened to ensure that these goals are fully realised. Without clearer integration of community benefits, robust governance structures, and specific, dedicated resources for First Peoples and communities, there is a risk that the energy transition may not achieve its full potential in fostering social equity and community resilience.

We have reviewed the Draft VTP Guidelines in detail, and provide the following recommendations for your consideration (which are elaborated on in subsequent sections):

1. Establish **clearer links to the [\(Draft\) VTIF REZ Community Benefits Plan](#)**.¹
2. Commit to **resourcing and empowering First Peoples across all aspects** of the energy transmission planning process.
3. Outline a proposed **governance structure and resources for place-based community engagement**.
4. Ensure that **environmental protection and the minimisation of land-use conflict** underpin the energy transmission planning process.

We urge the Victorian Government to incorporate these recommendations into the final VTP Guidelines to ensure a just and inclusive energy transition that benefits all Victorians.

¹ [Draft Renewable Energy Zone Community Benefits Plan](#), (('Draft) VTIF REZ Community Benefits Plan').

CPA Capability

Community Power Agency is a not-for-profit organisation that works with a range of stakeholders to facilitate a faster and fairer transition to clean energy. Our staff currently work across four different state REZ contexts: Queensland, New South Wales, Victoria and Tasmania. Community Power Agency has been working with the renewables sector for over a decade to build capacity and improve practice around social licence, community engagement, benefit sharing, co-investment and co-ownership models.

We have authored industry guides for the Tasmanian, ACT and Victorian governments; along with other specialist publications for bodies such as the Clean Energy Council and the Institute of Sustainable Futures. Notably, we recently authored a [discussion paper](#) on Regional Benefit Sharing,² focused on creating strategic impacts for regions that host multiple renewable energy projects. We also recently [submitted feedback](#) on the [\(Draft\) VTIF REZ Community Benefits Plan](#),³ which has helped to inform the following recommendations for improving the Draft VTP Guidelines.

1. Establish clearer links to the (Draft) VTIF REZ Community Benefits Plan

We are pleased that the Draft VTP Guidelines outline a commitment to incorporating First Peoples and community views in the development of the 2025 VTP, to minimise negative impacts and maximise benefits for regional communities.

As stated in the Draft VTP Guidelines, VicGrid has the responsibility “*for undertaking transmission infrastructure planning, coordinating end-to-end engagement, and administering community benefits arrangements in Victoria.*”⁴ We see these responsibilities as fundamentally interconnected, and strongly suggest that the Draft VTP Guidelines make explicit reference to the (Draft) VTIF REZ Community Benefits Plan.

² Hicks, J & Mallee K (2023) *Regional Benefit Sharing - Creating strategic impacts for regions that host multiple renewable energy projects*, Community Power Agency, Sydney. Available at: <https://cpagency.org.au/wp-content/uploads/2023/10/Regional-benefit-sharing-paper-2023.pdf>.

³ [Draft Renewable Energy Zone Community Benefits Plan](#), (('Draft) VTIF REZ Community Benefits Plan').

⁴ [Draft Victorian Transmission Plan Guidelines](#) ('Draft VTP Guidelines'), p. 10.

This should include an outline of how the proposed ‘Community Reference Groups’ (referenced in the (Draft) VTIF REZ Community Benefits Plan) will have input into the development of the 2025 VTP and any benefit sharing programs associated with transmission infrastructure.

2. Commit to resourcing and empowering First Peoples across all aspects of the energy transmission planning process

We commend the Victorian Government for including a commitment to partnering with First Peoples in developing the 2025 VTP, in line with the principles of self-determination. We are pleased that, as stated in the Draft VTP Guidelines:

VicGrid is committed to the Pupangarli Marnmarnepu ‘Owning Our Future’ Aboriginal Self-Determination Reform Strategy and intends to work in partnership with First Peoples.⁵

However, we recommend that the Draft VTP Guidelines go further in committing to work in partnership with First peoples, by outlining the proposed governance mechanisms and specific resources for allowing First Peoples to have real decision-making power on the aspects of the VTP that affect their interests. As recognised in the [Pupangarli Marnmarnepu ‘Owning Our Future’ Aboriginal Self-Determination Reform Strategy](#), this includes People, Systems and Country, and the need for government transparency and accountability as these are navigated.⁶

It follows that the Draft VTP Guidelines should seek to identify structural and policy barriers that may reduce active participation of First Peoples in the transmission planning process. In preparing these amended Guidelines, it would be prudent to undertake a consultation and co-design process with First Peoples, to ensure that engagement is meaningful, inclusive, transparent, informed, accountable and valuable,⁷ and that partnerships between VicGrid and First Peoples are substantial rather than purely aspirational.

⁵ [Draft Victorian Transmission Plan Guidelines](#) (‘Draft VTP Guidelines’), p. 34.

⁶ See [Pupangarli Marnmarnepu ‘Owning Our Future’ Aboriginal Self-Determination Reform Strategy 2020-2025](#), pp. 17-24.

⁷ See [Pupangarli Marnmarnepu ‘Owning Our Future’ Aboriginal Self-Determination Reform Strategy 2020-2025](#).

We note that, as acknowledged in the Draft VTP Guidelines' *Appendix A: Strategic Land Use Assessment*,⁸ cultural heritage assessment to this point has been largely limited to what exists in cultural heritage records, and that:

*Feedback from First Peoples and Traditional Owners on renewable energy and transmission development will be vital in this process, so we can understand and protect Country. This will enable the model to progressively include relevant tangible and intangible Aboriginal and historical cultural values to help avoid places of cultural significance. This will be done in conjunction with the more detailed assessments for proposed REZs and any new transmission projects for the 2025 VTP, and processes following publication of the 2025 VTP.*⁹

While we commend this aspiration, we suggest that the Draft VTP Guidelines include some more specific action points to ensure that the objective of understanding and protecting Country is achieved. We acknowledge that, as stated in the Draft VTP Guidelines:

*VicGrid is committed to supporting and empowering [Registered Aboriginal Parties (RAPs)] to assist in mapping and assessments. This could include through providing funding and other capacity-building support to RAPs, so they can resource and run their own renewable energy engagement programs aligned with self-determination principles.*¹⁰

The commitment to providing funding and other capacity-building support to RAPs is a positive first step to ensure that First Peoples play an active role in strategic land use and cultural heritage assessments. However, we believe that this commitment could be expressed in stronger and more specific language, to ensure that adequate resources are afforded to First Peoples to fully participate in this process.

We also suggest that resourcing for First Peoples is expanded beyond their involvement in strategic land use and cultural heritage assessments (as outlined in section 5.3 of the Draft VTP Guidelines), to include adequate resourcing for their involvement in other aspects of VTP development.

⁸ [Draft Victorian Transmission Plan Guidelines Appendix A: Strategic land use assessment](#) ('Draft VTP Guidelines Appendix A: Strategic Land Use Assessment').

⁹ [Draft Victorian Transmission Plan Guidelines Appendix A: Strategic land use assessment](#) ('Draft VTP Guidelines Appendix A: Strategic Land Use Assessment'), p. 20.

¹⁰ [Draft Victorian Transmission Plan Guidelines](#) ('Draft VTP Guidelines'), p. 35.

We suggest that the Draft VTP Guidelines make reference to benefit sharing with First Peoples, and commit to resourcing First Peoples to undertake engagement and planning for the management of financial and other benefits (that will be delivered by transmission infrastructure projects, as part of industry benefit sharing schemes). This should include both funding and other capacity-building support, to mitigate engagement fatigue on First Peoples.

The forthcoming [First Nations Clean Energy Strategy](#),¹¹ when released later this year, may be a useful document to reference in the Draft VTP Guidelines, to broaden the scope of First People’s decision-making opportunities and to keep the Draft VTP Guidelines in step with best practice opportunities for self-determination by First Peoples in energy sector planning.

3. Outline a proposed governance structure and resources for place-based community engagement

We are pleased that the Draft VTP Guidelines (in section 6.2) set out an approach to place-based community engagement, to ensure that *“regions and communities have the agency and opportunity to meaningfully participate in the planning and development of REZs and the benefits of the energy transition.”*¹²

However, in outlining the 6 underlying objectives for VicGrid’s community engagement model,¹³ we recommend that the Draft VTP Guidelines include greater detail on the governance mechanisms and resources that will be afforded to communities to ensure their active involvement in the development of the 2025 VTP.

This will require funding and support allocation, whether from the Victorian Government (e.g. similar to the previous Community Power Hubs program), or from the Federal Government (e.g. through our [proposed Local Energy Hubs model](#)).¹⁴ [Local Energy Hubs](#) are a proposed network of 50 independent, Federal Government-funded outreach centres in regional areas, empowering locals to actively participate in and benefit from the clean energy shift underway.¹⁵

¹¹ First Nations Clean Energy Strategy (forthcoming), as referenced by the [Energy and Climate Change Ministerial Council](#) (Webpage, 2024).

¹² [Draft Victorian Transmission Plan Guidelines](#) (‘Draft VTP Guidelines’), p. 37.

¹³ [Draft Victorian Transmission Plan Guidelines](#) (‘Draft VTP Guidelines’), p. 37.

¹⁴ Policy Summary for Local Energy Hubs, available at: <https://drive.google.com/drive/folders/1EXV-RzrSqPT9bLNIGjEQQvWY5I8MgOCH>.

¹⁵ Visit www.localenergyhubs.org.au.

As trusted local hubs for information, these outreach centres would actively build the social licence required for the clean energy shift.¹⁶ We recommend that the Victorian Government express support for the establishment of Local Energy Hubs, which would significantly help to achieve the objectives of VicGrid’s community engagement model.

4. Ensure that environmental protection and the minimisation of land-use conflict underpin the energy transmission planning process

Protecting Victoria’s natural environment and ecosystems is a key consideration when identifying areas for renewable energy development and transmission. It is insufficiently clear from the Draft VTP Guidelines to what degree these considerations will be factored into the strategic land-use planning assessment. We request that further detail is included in the final VTP Guidelines.

If land-use conflict is to be managed well, shared-land use planning needs to be further investigated and incorporated into the strategic land-use assessment outlined in the Draft VTP Guidelines. This could include an approach for managing conflicts and share land-use between transmission infrastructure development and:

- Public spaces
- Cultural practice
- Agriculture
- Industry
- Conservation

This would encourage an approach that considers multiple land-use opportunities, and a planning process that better incorporates existing and future land-use opportunities into REZ design.

¹⁶ Policy Summary for Local Energy Hubs, available at:
<https://drive.google.com/drive/folders/1EXV-RzrSqPT9bLNIGjEQQvWY5I8MgOCH>.

Conclusion:

We thank you for developing the Draft VTP Guidelines and providing the opportunity for feedback. We would welcome the opportunity to follow up and provide additional detail on any of the points made herein, if desired. We look forward to reviewing a revised version of the VTP Guidelines.

Regards,

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