

Eudunda Community, Business & Tourism Committee
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Australian Energy Regulator
contingentprojects@aer.gov.au
Level 11, 1 King William Street
Adelaide SA 5000

Subject: Objection to ElectraNet's Stage 1b Early Works Contingent Project Application

Dear Members of the Australian Energy Regulator,

The Eudunda Community, Business & Tourism Committee hereby submits this response in objection to ElectraNet's Stage 1b Early Works Contingent Project application for the Northern Transmission Project (NTx). We thank the AER for the opportunity to make submissions on this contingent revenue proposal, which seeks approval for \$29.5 million in early works costs including land acquisition, planning and environmental approvals for a major new transmission infrastructure project. ([Australian Energy Regulator \(AER\)](#))

1. Insufficient Evidence of Consumer Benefit & Cost Efficiency

The AER's role in this review — to ensure that consumers pay no more than necessary for prudent and efficient expenditure — is critical. ([Australian Energy Regulator \(AER\)](#)) We note that contingent project applications allow transmission network service providers to recover costs ahead of committed construction, often before detailed environmental, social or economic impacts are fully understood. Given recent precedents in other large transmission infrastructure applications (e.g. Project EnergyConnect), independent reviews have found that net benefits can be overstated and uncertain, with modelling lacking sufficient stakeholder scrutiny, and consumer cost impacts potentially underestimated. ([Australian Energy Regulator \(AER\)](#))

AEMC determinations have previously highlighted that proposals to ask consumers to pay for transmission assets prior to them being built can impose additional costs and financial risk on households and small business customers — precisely the outcome the AER is tasked with preventing. ([Australian Energy Market Commission](#)) We therefore urge the AER to critically examine whether the claimed benefits of early approval genuinely outweigh the known and foreseeable costs, especially to regional communities that may bear disproportionate impacts.

2. Visual Amenity, Landholder Impact and Community Wellbeing

It is well established in the peer-reviewed literature that overhead high-voltage transmission infrastructure can produce significant negative externalities for local communities. Research on high-voltage overhead transmission lines (HVOTLs) has consistently identified *visual nuisance* as a major factor contributing to local opposition and economic impacts, particularly through effects on property values and perceptions of quality of life.

([ScienceDirect](#))

For example, hedonic price modelling in academic studies shows that properties located within close proximity to existing HVOTLs can suffer relative *price depreciation* — a clear indicator of community value loss — and that when such lines are undergrounded, affected property values can meaningfully increase. ([ScienceDirect](#)) There is also substantial literature reflecting that communities often perceive transmission lines as imposing external costs in terms of aesthetics, land use constraints, and potential stigma — issues especially sensitive in rural and tourism-dependent areas like Eudunda. ([ScienceDirect](#))

While aesthetic concerns may be dismissed by some as subjective, their real economic effects are documented: local expenditure, tourism appeal and property market confidence can all be diminished when major transmission infrastructure alters landscape character. These impacts are especially pronounced in regions with existing historic features, agritourism, and heritage values.

3. Environmental and Land-Use Costs Under-Represented

The AER's overview and ElectraNet's own public materials highlight future environmental approvals and assessments to consider native flora and fauna impacts. ([Northern Transmission Project](#)) However, *earlyworks contingent revenue approvals risk locking in more progress before these assessments are complete*. Peer-reviewed research clearly shows that overhead lines have broader environmental footprint and land-use trade-offs compared with buried cables — particularly in areas of ecological or cultural significance — and these costs are often externalised rather than internalised into project planning. ([Curtin Research](#))

The agricultural productivity and tourism appeal of landscapes can be disrupted by corridor establishment, right-of-way clearing, and ongoing maintenance requirements for overhead lines. These impacts are not just visual but extend to land management practices and the community's ability to determine long-term land use.

4. Alternative Options and Undergrounding Potential

While the technical complexities of underground transmission are acknowledged — including higher cost and technical constraints — recent Australian research underscores the value of exploring such options where community, environmental and economic values are at stake. ([Curtin Research](#)) The Curtin and University of Queensland report on overhead vs underground infrastructure illustrates that broader community impacts and social licence considerations are essential components when comparing alternatives, not ancillary afterthoughts. (eeecs.uq.edu.au)

5. Previous Community Experiences with ElectraNet Consultations

The clear lack of meaningful engagement, information on project implementation/progression/obsolescence and community benefits has already been highlighted in our submission to ElectraNet, as per our attached letter “Eudunda Community Business and Tourism submission to ENet NTx South”. We urge you to consider both the previously mentioned letter and our email attachment “Email to Tony Mahar 2026.02.03” in conjunction with this objection, as it clearly identifies our concerns and the fact that “the engagement process comes before the information providing process which is causing huge issues for landowners to make educated choices about how this would affect their lives/businesses”.

Given this, we respectfully submit that the contingent revenue application should be reconsidered or conditioned to require a robust cost-benefit analysis comparing overhead and underground options *within and adjacent to the Eudunda region*, including compensation frameworks for landowners and businesses if adverse impacts are found to be material.

In light of the above — including AER’s statutory role to protect consumers, independent evidence on transmission line externalities, and the importance of safeguarding regional economic and social wellbeing — the Eudunda Community, Business & Tourism Committee objects to the approval of the Stage 1b contingent project as currently proposed.

We request that the AER:

1. Scrutinise whether the claimed benefits justify early cost recovery and whether alternative timing or scaled approaches would be more prudent.
2. Ensure any approval is conditional on comprehensive environmental impact assessments, inclusive community consultation outcomes, and evaluation of overhead vs underground alternatives.
3. Require transparent mechanisms for compensation or mitigation for demonstrable community, social and economic impacts.

Thank you for considering our submission.

Regards,

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Eudunda & Mid North Districts NTx Community Response Sub Committee of
Eudunda Community, Business & Tourism Committee