



Tasmanian Council of Social Service Inc.

Submission to the *Draft Renewable Energy Coordination Framework*

March 2021



INTEGRITY
COMPASSION
INFLUENCE

About TasCOSS

TasCOSS' vision is one Tasmania, free of poverty and inequality, where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry, and to change the systems, attitudes and behaviours that create poverty, inequality, and exclusion. Our membership includes individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage and promote the adoption of effective solutions to address these issues.

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Introduction

Thank you for the opportunity to comment on *The Draft Renewable Energy Coordination Framework* (the Framework) which lays a path forward on “how to deliver orderly, sustainable and integrated large-scale renewable energy projects needed to unlock generation capacity to achieve the TRET” (Tasmanian Renewable Energy Target).¹

TasCOSS represents the interests of low-income Tasmanians experiencing disadvantage and advocates on their behalf. Our submission is informed by our research, engagement with our members, collaboration with our industry organisations and networks, and the lived experiences of the Tasmanians we represent, all of whom are energy consumers.

In TasCOSS’ submission to *The Draft Tasmanian Renewable Energy Action Plan 2020*² (TREAP), we made ten recommendations relating to customer benefits and supports for low-income Tasmanians (see Appendix 1). While it remains unclear the extent to which these recommendations have been addressed, our focus in this submission is on similar issues of transparency around benefits and costs of the Framework, governmental accountability, equity for Tasmanians on low incomes and greater clarity on engagement processes for people and communities experiencing disadvantage.

TasCOSS commends Renewables Tasmania’s aim: “the heart of this Framework is communities and fostering partnerships to develop and deliver our plan for growth”.³ We look forward to seeing how this aspiration is put into action in authentic ways and believe that the recommendations we propose in this submission will assist Renewables Tasmania to achieve its aim. We consider the Framework should deliver for Tasmanians:

- greater and more equitable access to information, support and resources on Framework activities for Tasmanians experiencing disadvantage;
- access for Tasmanian communities to information and greater clarity on the costs and benefits of Tasmania’s renewable energy future;
- genuine agency and an authentic voice for Tasmanians experiencing disadvantage as a key stakeholder group to influence decision-making processes; and
- protections against negative impacts on residential customers, in particular, vulnerable customers.

Key Issues

This submission focuses on Section 4 of the Framework, *What the Framework Delivers*. We discuss three overarching issues in the Framework that span multiple dimensions of the Framework’s objectives and propose associated recommendations.

¹ Renewables Tasmania (2021) [Draft Renewable Energy Coordination Framework](#)

² TasCOSS (2020) [Submission to the Draft Tasmanian Renewable Energy Action Plan 2020](#)

³ Renewables Tasmania (2021) [Draft Renewable Energy Coordination Framework](#)

Key Issue One: Ensuring Tasmanians experiencing disadvantage have equitable voice and influence

The Good Governance Institute, UK, states:

The time has come to look beyond mere compliance – to go beyond paying lip service to community engagement and see it instead as a core strategic activity to legitimise decision-making and increase resilience.⁴

This principle argues that community engagement is a strategic priority and not a tokenistic activity. The extent to which Tasmanian communities, particularly those experiencing disadvantage, have a voice in and influence over activities and outcomes in the Framework is critical for two reasons. First, participation by communities in decisions that affect them is key to community strength and resilience. Second, research shows that communities already experiencing disadvantage are often disproportionately negatively affected by large renewable energy projects,⁵ potentially as a result of them being most often excluded from stakeholder engagement processes.⁶ We do not want inequitable processes or outcomes replicated in Tasmania.

We therefore encourage Renewables Tasmania to be explicit, thoughtful, and inclusive in how they approach engaging with all levels within these communities, noting that those experiencing disadvantage will likely face greater barriers to engagement and will therefore require additional, considered support. This should be explicitly built into the following goals from the Framework.⁷

1.2.1 Alignment of energy and land use, environmental and social policies and strategies to enable appropriate development

AND

2.1.1 Mapping of priority areas within Tasmania’s Renewable Energy Zones (REZs)

AND

2.1.2 Early community engagement on REZs planning

TasCOSS encourages Renewables Tasmania to outline its approach to stakeholder engagement beyond the reference to “best practice” under Goal 3.2 “Participatory and transparent engagement”. The Framework references “best practice” stakeholder engagement and provides examples including the Clean Energy Council’s Community Engagement Best Practice Charter. While a valuable resource, this charter does not reference engagement with disadvantaged or vulnerable stakeholders. A truly best practice approach will ensure Tasmania’s high proportion of communities experiencing disadvantage have an authentic voice and genuine agency in decision-making processes that impact their lives. Applying best practice stakeholder engagement must be synonymous with listening to and acting in the best interests of those most vulnerable.

⁴ The Good Governance Institute (2019) [Authentic engagement and community voice](#)

⁵ Carley, S., Konisky, D.M. [The justice and equity implications of the clean energy transition](#). *Nat Energy* 5, 569–577 (2020).

⁶ Mercer-Mapstone, L., W. D. Rifkin, W. R. Louis and K. Moffat (2017, Chapter 4). "Meaningful dialogue outcomes contribute to laying a foundation for social licence to operate." *Resources Policy* 53: 347-355.

⁷ Renewables Tasmania (2021) [Draft Renewable Energy Coordination Framework](#)

The Framework aims to deliver, through analysis and mapping, “a plan for each REZ that identifies areas that are likely to be most appropriate for renewable energy development” (Objective 2 of the Framework).⁸ The term “appropriate” needs further clarification. For example, if the plan identifies areas for a REZ which results in loss of tourism and thus livelihoods for a local community within the REZ but is the most economically sound location for the REZ according to technical experts or industry proponents, whose voice will determine whether the loss of income in the local economy is worth the boost to the state economy?

Similarly, “the Framework aims to ... work closely with communities and relevant stakeholders to deliver sustainable development in the right place, in the right way, and at the right time”.⁹ TasCOSS encourages clarification as to what defines “right” and according to whom. For example, were industry and community to have different understandings of the “right” place and time, which voice is listened to?

TasCOSS appreciates that Renewables Tasmania has committed to “ensure the values, impacts and social implications/factors identified by communities need to be considered alongside the technical and economic inputs that determine the location, design and staging of development” (Objective 2 of the Framework)¹⁰. TasCOSS encourages Renewables Tasmania to consider the concept of Social License to Operate (SLO)—which discusses the need for every development to have a minimum level of social acceptance and trust from local communities and the public before proceeding. Importantly, this license should be given as much, if not more, legitimacy as any regulatory license to operate¹¹. In this context, we would hope that the issues identified by communities who will be impacted by any projects under the Framework are given (at a minimum) equal consideration alongside technical and economic perspectives. This will be critical as, in the words of the Framework itself, “the renewable energy vision will require high levels of engagement and *acceptance*”.¹²

The current regions highlighted to be REZs (Figure 1) are within Tasmanian electorates which have high populations of people experiencing “persistent disadvantage”.¹³

As shown in Figure 2, the electorates of Bass, Braddon, and Lyons are all well below the Australian average on the Australian persistent disadvantage index¹⁴. The disadvantage index importantly takes into consideration not just economic circumstances but also education, health and social factors driving persistent disadvantage.

⁸ *ibid*

⁹ *ibid*

¹⁰ *ibid*

¹¹ Social Licence (2020) [The Social Licence to Operate](#)

¹² Renewables Tasmania (2021) [Draft Renewable Energy Coordination Framework](#), (*emphasis added*)

¹³ Catholic Social Services Australia (2020) MAPPING THE POTENTIAL: [Understanding persistent disadvantage to inform community change](#)

¹⁴ *ibid*

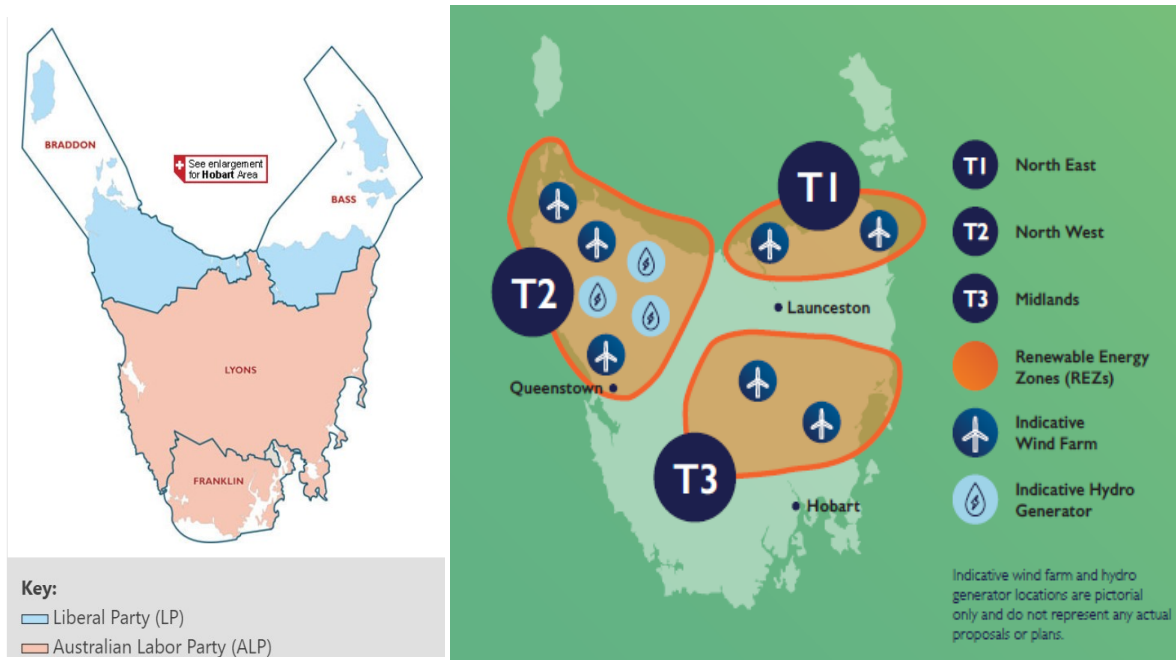


Figure 1: Tasmania's electorates (LHS; Source: AEC) compared to proposed renewable energy zones (RHS; Source: Renewables Tasmania)

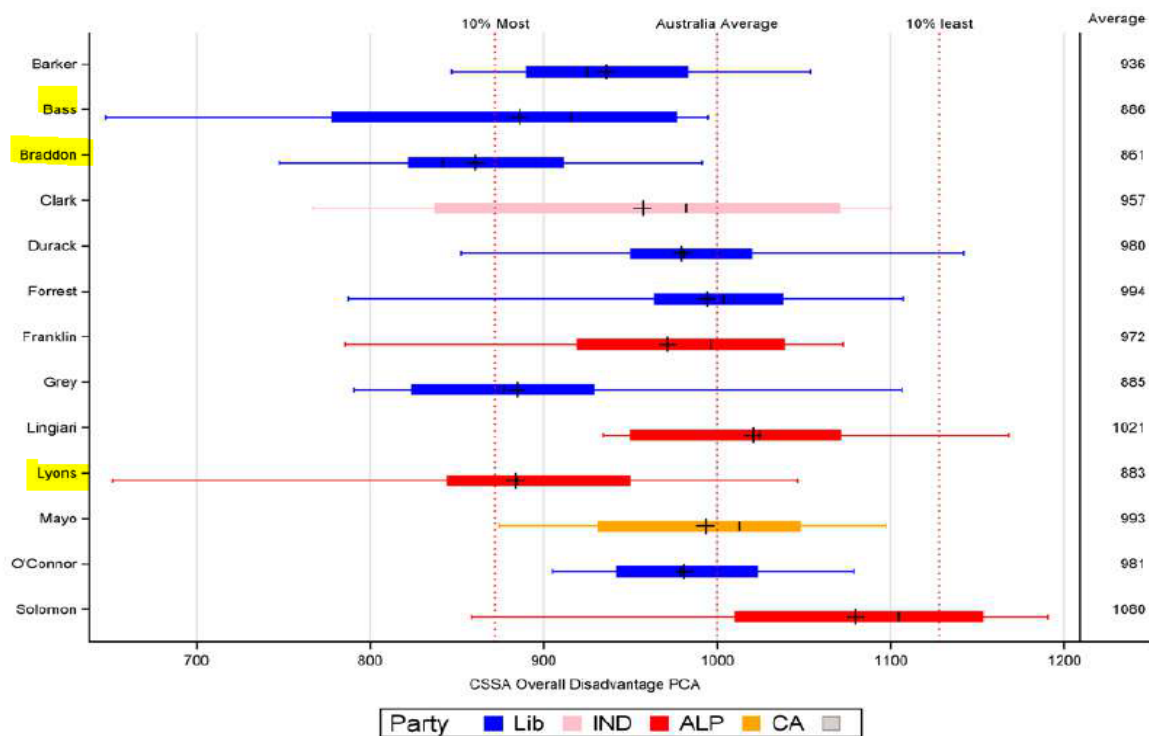


Figure 2: Disadvantage Index box plots for Tasmanian (and other) electorates. Source: Catholic Social Services Australia

It is critical that these communities, where there are lower than average levels of functional and digital literacy, are given the support, skill development, representation, and information they need to make informed decisions in landholder negotiations and consultation processes which enable them to equitably advocate for their own best interests. Of particular importance is that this information and support is delivered to communities in ways that are accessible given their needs.

For example, Goal 3.3 “Clear, compelling and authentic communication of the Government’s renewable energy vision” indicates that this communication will happen primarily through a website (3.3.1) and “access to centralised information” (3.3.2). If this centralised information is based on the aforementioned website, TasCOSS would like to see a plan for how Renewables Tasmania will deliver information to the many Tasmanians in REZs who do not have the technology, internet, or digital literacy levels to access such online platforms.

TasCOSS welcomed the *Giving young Tasmanians their say on the Draft Renewable Energy Action Plan*¹⁵ publication and encourages Renewables Tasmania to consider how such forms of lay and accessible communications might be expanded/built upon to provide similar information to engaged stakeholders in this context.

Recommendation 1:

All Tasmanian communities, particularly those who may be at a disadvantage in participating in consultations and negotiations, are given the support, skill development, representation, and information they need, and platforms they can access, to make informed decisions and advocate for their own best interests. Renewables Tasmania commits in the Framework to providing Tasmanian communities with accessible and inclusive forms of engagement, and agrees to value those interests equally with the views and interests of other stakeholders and proponents.

Key Issue Two: Making explicit the benefits and costs to residential and low-income Tasmanians

Goal 3.1 “Understanding what matters most to maximise benefits” indicates a commendable commitment by Renewables Tasmania to go beyond regulatory requirements in the implementation of the Framework to share the financial benefits of renewable energy growth with community. This goal will be delivered by Action 3.1.1 – “Collaborating with industry to deliver Community Benefit Schemes within Renewable Energy Zones to maximise local and regional benefits”.

TasCOSS’ submission to the Project Marinus Project Assessment Draft Report (PADR)¹⁶ focussed on our concerns regarding the potential price impacts for Tasmanian residential customers of the Marinus Link—one of the flagship projects under TREAP. We raised the question of who will pay for the Marinus Link and expressed our concern that while there are net-benefits to the National Electricity Market

¹⁵ Renewables Tasmania (2020) [Giving young Tasmanians their say on the Draft Renewable Energy Action Plan](#)

¹⁶ TasCOSS (2020) [Submission to the Project Marinus Project Assessment Draft Report](#)

(NEM) from this project, there has been no commitment that Tasmanian customers will not be worse off.

We hold similar concerns that the State Government has made no such commitments around any potential projects under the Framework. TasCOSS also believes that there is not yet sufficient clarity about the projected net benefits of activities under the Framework for residential households, particularly for those in the low income or disadvantaged areas most likely to bear the brunt of the impacts of regional developments.

It is important that the impacts of any renewable energy developments are understood by local communities. For example, given that the Tasmanian Government has recently announced that our state is now 100% self-sufficient in renewable energy generation¹⁷, Tasmanian households should not be expected to pay a further premium for projects that will deliver most benefit to mainland NEM customers and the developers of renewable energy projects. TasCOSS believes that this is the crux of the issue regarding the cost-benefit analysis of the Framework and awaits further transparency on the impacts of planned developments, such as those on electricity prices, for residential customers.

Recommendation 2:

Renewables Tasmania makes a commitment in the Framework that Tasmanian customers will not be worse off—financially, socially, or culturally—as a result of Tasmania’s renewable energy growth plans. This must include publication of the results of their cost-benefit analyses using lay language, outlining the details of both the anticipated benefits and costs for residential Tasmanians.

Key Issue Three: Specifications associated with Renewable Energy Zones

Objective 2 of the Framework is to establish REZs in Tasmania as is currently underway in other states. The Framework does not specify what constitutes a REZ in this context. The Climate Council defines a REZ as setting “renewables-rich areas up with the right infrastructure and transmission capacity” to send renewable energy where it needs to go¹⁸. TasCOSS would like to see publication of what the benefits to such REZs would be in the Tasmanian context.

Key findings of a report looking into the challenges of developing REZs in Australia found that the complex regulatory environment associated with REZs can result in a landscape that “incentivises speed over potential efficiency gains, and thus creates barriers to information sharing and collaboration”¹⁹. Further, a recent COAG consultation paper stated “If they wished, State and local governments could further enhance the benefits of a coordinated process by streamlining the environmental and planning approval process for certain REZs.”²⁰

¹⁷ Hon Guy Barnett MP, Minister for Energy (2020) [Tasmania surges to 100% renewable energy](#)

¹⁸ Climate Council (2020) [What is a Renewable Energy Zone?](#)

¹⁹ Baringa (2020) [Development of Renewable Energy Zones in the NEM Key Findings](#)

²⁰ COAG Energy Council (2021) [ENERGY SECURITY BOARD RENEWABLE ENERGY ZONES: Consultation paper](#)

The Framework acknowledges:

“There are several steps that must occur before renewable energy projects can be built. The site must be monitored and tested to confirm the resource quality, environmental assessment undertaken, planning approvals granted, and landholder negotiations completed” (Objective 1 of the Framework)²¹.

The potential to bypass proper process in the pursuit of REZs is of great concern to TasCOSS. We urge Renewables Tasmania to ensure compliance with state and federal statutory and planning approvals processes in the setting up of Tasmania’s REZs. As outlined above, we also recommend that the establishment of REZ locations is conducted in genuine partnership with communities living within those proposed zones.

Recommendation 3:

Renewables Tasmania commits in the Framework that the creation of Renewable Energy Zones will not override state and federal statutory and planning approvals processes and will be designed in partnership with communities in the planned zones.

Conclusion

TasCOSS welcomes the clear commitment to Tasmania’s renewable energy future laid out in the Framework. We support the aspiration to partner with communities to ensure mutual benefits for all stakeholders concerned with and impacted by the actions under the Framework, and for all Tasmanians more broadly.

TasCOSS emphasises and reiterates concerns raised in our submission on the TREAP that the costs and benefits associated with activities under the Framework be made transparent in accessible ways through a variety of platforms. We are concerned with the potential for Tasmanian households, in particular low-income customers, to be burdened with the cost impacts of renewable energy developments and activities, while the benefits flow primarily to mainland NEM customers and proponents of such developments.

Our primary focus in influencing the development of the Framework is to ensure that all community, and in particular Tasmanians on low incomes and those experiencing disadvantage, have equitable access to the support and information needed to make informed decisions, to have their voices influence decisions which affect them as key stakeholder groups, and that they are protected from negative impacts of any proposed activities under the Framework.

²¹ Renewables Tasmania (2021) [Draft Renewable Energy Coordination Framework](#)

Appendix 1

Recommendations from the TasCOSS (2020) submission to *The Draft Tasmanian Renewable Energy Action Plan 2020*.²²

1. The Tasmanian Government states its view of Tasmania's fair share of Marinus Link costs, prior to the determination of the fair cost allocation.
2. Government provides a form of guarantee that Tasmanian residential customers will not be worse off as a result of Marinus Link over the life of the asset.
3. Make permanent additional supports for customers in financial stress, in particular the moratorium on disconnections and a customer support fund.
4. The Tasmanian Government considers additional assistance for low-income households impacted by COVID-19.
5. The Tasmanian Government reconsiders its target of the lowest regulated electricity prices and revises it to a target of the lowest electricity prices (standing or market offer) in the NEM.
6. The *Aurora+* app fee be immediately waived for concession customers and a commitment made to remove the fee for all customers.
7. All levels of government and National Cabinet work together to implement the joint proposal for a *National Low-income Energy Productivity Program*.
8. The Tasmanian Government re-establishes the Power\$mart Homes program and the Tasmanian Energy Efficiency Loans Scheme.
9. The Tasmanian Government develops policy solutions and support measures targeted at Tasmanians on low incomes and renters, that encourages investment in DER.
10. Work with community, business and skills and education providers to attract young people, women and the long-term unemployed into the *Energising Tasmania* initiative.

²² TasCOSS (2020) [Submission to the Draft Tasmanian Renewable Energy Action Plan 2020](#)