ENERGY ROADMAP AMENDMENT BILL 2025

Submission No:	22
Submitted by:	Windlab Developments Pty Ltd
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

WINDLAB
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30 October 2025

Hon David Janetski MP
Treasurer; Minister for Energy; Minister for Home Ownership
Queensland Government
GPO Box 611
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Lodged online via the Queensland Parliament website

Dear Chair and committee members,

Submission on the *Energy Roadmap Amendment Bill 2025*

Windlab appreciates the opportunity to provide a submission to the Committee on the *Energy Roadmap Amendment Bill 2025* and its proposal to deliver energy infrastructure and investment to support affordable, reliable and sustainable energy for Queenslanders.

About Windlab

Windlab is the Australian renewable energy company leading the charge towards secure, sustainable and affordable clean energy for all Australians, now and for the future. For 20 years, we've used our world-leading science and globally recognised expertise to find, develop, and deliver the best renewable energy projects in the world.

Queensland represents a key growth area for Windlab, and we're making a significant commitment - injecting an estimated $5 billion into the local economy through job creation, supply chains, and contracting opportunities.

Summary of key points and recommendations

Windlab **supports the objectives of the Bill** to deliver energy infrastructure and investment that's affordable, reliable and sustainable for Queenslanders. Windlab would also like to outline its support for the submission raised by the Queensland Renewable Energy Council. Our submission focuses on CopperString, the Regional Energy Hubs and the role of private investment, and puts forward recommendations that strengthen the reforms, including:

1. Reinstatement of Renewable Energy Targets to enable private sector investment certainty and align with Queensland's net zero emissions by 2050 commitment;
2. Support of a market-led approach to Regional Energy Hubs (including new transmission infrastructure) facilitated by private sector investment;
3. Support of the role of Government Owned Corporations in partnering with the private sector on new energy generation opportunities through Power Purchase Agreements; and
4. Recommendation of an "open access" model for grid connection into the CopperString project that supports bringing advanced energy projects efficiently to market (as per the standard National Electricity Rules).

Kind regards,

[redacted]

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Introduction

Windlab thanks the Governance Energy and Finance Committee (**GEFC**) for the opportunity to provide a submission on the *Energy Roadmap Amendment Bill* 2025 (the **Bill**). Windlab would also like to outline its support for the submission raised by the Queensland Renewable Energy Council (**QREC**).

Windlab is an Australian renewable energy company, born out of the CSIRO. For over 20 years Windlab has used world-leading science and globally recognised expertise to find, develop, construct and operate renewable energy projects. Windlab has demonstrated a strong commitment to investing in Queensland's regional communities with over 4 gigawatts of advanced renewable energy projects under development.

Windlab takes pride in our track record as a responsible and responsive long-term partner in regional communities. Through early engagement, transparent benefits, and consistent follow-through, we work closely with landholders, communities, Traditional Owners and local governments to deliver a positive legacy of prosperity for regional communities and the Queensland economy.

Detailed response

Windlab's submission focuses on the reinstatement of a Renewable Energy Target, open access model for grid connection to the CopperString transmission project, Powerlink's role in transmission infrastructure development through Regional Energy Hubs and the role of GOCs in partnering with the private sector.

The Role of Renewable Energy Targets

Windlab is disappointed to see the removal of legislated Renewable Energy Targets, which have been a key cornerstone in driving Queensland's clean energy transition to date. Renewable Energy Targets are an important tool for driving continued investment in large-scale renewable energy generation, storage and transmission projects required to meet the ever-growing demand for clean electricity. **Windlab supports retaining clear, measurable Renewable Energy Targets that align with Queensland's policy commitment to net zero emissions by 2050.** Such targets provide long-term policy certainty, enabling private investors to plan and invest with confidence. These targets assist in reducing risk, lowering costs and maintaining momentum for renewable energy projects into the future.

Regional Energy Hubs and the critical role of transmission infrastructure

Windlab recognises the Bill's update to transition away from the existing Renewable Energy Zones framework (**REZs**) to the newly proposed Regional Energy Hubs (**Hubs**), which are intended to provide streamlined market-led delivery, improved flexibility and reduce administrative burden for energy and transmission projects located within these Hubs.

Windlab supports the market-led approach and policy intent behind the implementation of Hubs and the need for a coordinated development approach to the delivery of new transmission infrastructure and energy storage solutions. Whilst supportive of the policy intent of the Hubs, it is important that this is underpinned by clear criteria and governance frameworks which provide clear benefits and efficiencies for private developers with project opportunities located within proposed Hubs.

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Windlab values the Queensland market for its open-access grid connection model under the National Electricity Rules and market-based approach for the coordination of new energy generation. New transmission infrastructure requires efficient and coordinated planning and delivery to support the timely development of new renewable energy projects.

For instance, Windlab is developing the Bungaban Wind Farm which includes up to 1400MW of wind generation and 600MW of battery storage in south-east QLD. As part of this project, Windlab is wholly funding the development and construction of an 84km transmission line to connect the project to the existing transmission network – possible due to the scale of the project, and the quality of the wind resource in that region. Once constructed, this transmission infrastructure will also unlock other energy generation projects in the region and is a demonstrated example of where market-led private investment can unlock shared transmission infrastructure under the newly proposed Hubs framework to deliver positive outcomes for Queensland consumers.

CopperString

Windlab supports the commitment to deliver the Eastern link of the CopperString transmission project, a key piece of transmission infrastructure that unlocks renewable energy resources within North Queensland.

In Windlab's view, it is essential that the connection to CopperString supports mature, well-developed projects that have a demonstrated understanding of the energy resources in the region. Windlab will be seeking grid connection to CopperString on its two projects – **Prairie and Wongalee – which are the most advanced wind development projects in the Hughenden region** and looks forward to progressing the grid connection process as quickly as possible to allow the projects to commence construction in a timely manner.

There are several critical items that must be finalised on CopperString to enable these projects to advance through the grid connection process (noting that currently the grid connection process is the critical path to commencing construction for these projects) and Windlab would urge the Committee to accelerate the finalisation of these four items:

1. Being able to commence the formal grid connection process to CopperString (submission of a Connection Enquiry, submission of a Connection Application, etc.) – and clarity on who will be facilitating this process as the Transmission Network Service Provider.
2. The technical details of CopperString must be finalised as soon as possible and become available to project developers (details such as final capacity, runback scheme requirements, fault level, impedances, harmonic allocations, etc.) to allow developers to finalise their technical design/grid models and commence the grid modelling aspects of the grid connection process.
3. Achieving "considered project" status (as defined in the National Electricity Rules) – ie. achieving sufficient certainty in CopperString as a project – which is critical for the project to achieve financial close.
4. It is also important to provide sufficient confidence in the construction and energisation timelines for CopperString, which provide developers and investors the certainty to begin constructing their energy generation projects in parallel, such that they are ready to begin commissioning the moment CopperString is energised (rather than having to wait until CopperString is energised to commence construction). We note these are challenges experienced by some projects within New South Wales (**NSW**) REZs, where projects are delayed and are unable to achieve financing until there is certainty on the timing of energisation of the relevant REZ transmission infrastructure.

Windlab is excited to bring these projects through to the construction stage as soon as possible.

Windlab encourages the Committee to ensure that the grid connection framework for CopperString recognises and supports advanced energy projects that are well-established in the region, in order to bring these projects to market as efficiently as possible.

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Powerlink's role in the technical aspects of the connection process

While we note Powerlink's reduced role in the construction and ownership of CopperString, Windlab would support Powerlink to continue to undertake the technical aspects of the grid connection process associated with grid modelling, Full Impact Assessment and the negotiation of Generator Performance Standards.

Windlab believes Powerlink to be very capable in this area, particularly given the additional complexity brought through large-scale energy projects, and wind projects in particular.

In other states, we have noticed the trend of trying to roll out a new grid connection process to "simplify" and "accelerate" it – however, in Windlab's experience, this usually results in processes which actually delay projects rather than accelerate them. As such, Windlab believes the fastest pathway to new energy generation projects commencing construction is to maintain Powerlink as the body undertaking the technical aspects of the grid connection process.

Open Access grid connection model for new transmission infrastructure

Windlab supports an "open access" grid connection model largely aligned with the National Electricity Rules over any sort of controlled access process (eg. such as those found in NSW REZs).

The NEM's "open access" process presents the best value for Queensland energy consumers by:

- encouraging a competitive process with a "first to actually start construction" approach, rather than a central planning body trying to decide the winners earlier in the process (and hence consumers ultimately taking the risk instead of developers);
- private developers take the risk on congestion (and are happy to do so);
- the market determines the optimal mix of energy generation based on real, project-specific economics to make best utilisation of transmission assets; and
- allows private projects - who are funding their own connection - to determine the most efficient way to connect to the market.

Role of Government Owned Corporations and QIC

At Windlab, we're proud to contribute to a more secure and affordable energy future for Queensland. Windlab welcomes the involvement of QIC to deliver the eastern link of CopperString. Windlab recognises that Government Owned Corporations (**GOCs**) have an important role in enabling investment in the renewable energy sector, particularly by de-risking projects through Power Purchase Agreements (**PPAs**). PPAs provide a flexible mechanism for government involvement without requiring full ownership of energy projects, and consequently enables more competitive projects through the attraction of private investment.

By reframing the target for GOC ownership of energy assets in Queensland, the amendments strengthen the enduring public ownership of existing generation assets. Key definitions within the target requirements are also clarified, providing that PPAs no longer constitute a form of public ownership, and that ownership targets relate only to State ownership.

Windlab welcomes the opportunity to work with QIC on enabling energy investment opportunities for GOCs through Windlab's advanced project portfolio through the recently established QIC Investor Gateway and Queensland Energy Investment Fund.

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The CQSQ Link / Queensland Supergrid South

Windlab notes the inclusion of the "New CQ-SQ substation" in Table 2.2 Key transmission augmentation projects (2025-2035), with the stated purpose:

> "*To support new generation connections in the Darling Downs and Surat, Powerlink will progress a new CQ-SQ substation joining into the Calvale – Halys 275kV line, delivering new transmission capacity from the substation to South West Queensland*".

Although the substation provides a point of connection it will not increase capacity in the network. This is an issue as the network is already constrained and therefore, will limit the viability of any new connections. Windlab urge the Committee to continue to consider a new transmission project to increase electricity transfer capacity between the Central Queensland (**CQ**) and South Queensland (**SQ**) regions (collectively **CQSQ**).

Both regions feature large amounts of existing loads as well as forecast load growth, however, interconnection capacity between these sub-regions are limited and congested. This means generators (both existing thermal generation and new renewable generation) are limited in how much capacity they can supply between these two sub-regions. Current constraints means that each of these sub-regions effectively needs to become self-sufficient and reduces the overall reliability of the transmission network.

Windlab notes the challenges of Gladstone Power Station's potential retirement in 2029, as well as a large number of wind farms currently being developed in the Central Queensland region. Greater CQSQ transfer capacity both provides a pathway for more energy projects to be developed in Central Queensland to help supply South Queensland, while also allowing existing generation in the South Queensland region to help supply Gladstone in the interim.

As background, Powerlink has previously proposed various options for "CQSQ" transmission links in recent years, and in its latest iterations, this evolved into the "Queensland Supergrid South" project – a double circuit 500kV transmission line connection from Calvale substation to Halys substation. However, with the rest of the 500kV network removed from the Queensland blueprint amidst rising transmission costs, building a 500kV "Queensland Supergrid South" project no longer makes sense.

Whilst a new 500kV transmission project integrated into Queensland's existing transmission network does not align with outcomes identified in the Bill, Windlab still sees a massive opportunity in building this Queensland Supergrid South project at a lower voltage – such as 275kV or 330kV – to improve transfer capacity between the regions and improve energy reliability for Queensland consumers.

If the Committee would like to discuss Windlab's feedback or get any further information, please do not hesitate to reach out directly to Nathan Blundell at [redacted], or Maggie Shelton at [redacted]

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