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To:	House of Assembly - GAA
Subject:	Submission to the House of Assembly Government Administration Committee A Inquiry into AI Data Centres in Tasmania
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Submission to the House of Assembly Government Administration Committee A
Inquiry into AI Data Centres in Tasmania

Persistence Analytics Group LLC

Persistence Analytics Group LLC respectfully submits this comment regarding the Committee's Inquiry into the construction and operation of AI data centres in Tasmania.

PAG takes no position in this submission on whether any particular proposed facility should be approved or rejected.

Our recommendation concerns the institutional evidence required before government, planning authorities, utilities or other public institutions rely on material representations associated with a data-centre development.

The Committee's Terms of Reference appropriately address protection of public resources and the environment, planning-system adequacy, parliamentary oversight, resource-consumption disclosure, community consultation and tangible public benefit.

Across each of those areas, Tasmania should distinguish between disclosure and validated institutional reliance.

An applicant may disclose expected electricity use, water requirements, backup-generation arrangements, employment, operating configuration, construction schedule or economic benefits. Disclosure alone does not determine whether the evidence underlying those representations is sufficiently complete, current and internally consistent for a consequential public decision to rely upon them.

PAG recommends that Tasmania establish an explicit Evidence & Revalidation Standard for major AI and data-centre developments.

For each material approval or resource-allocation decision, that framework should identify:

Requirement → Representation → Supporting Evidence → Dependency → Decision Threshold → Condition Precedent → Material-Change Trigger → Revalidation

This structure would allow decision-makers to distinguish among what has been demonstrated, what remains conditional, and what remains dependent upon future actions by the applicant, utility, network operator, government or another third party.

This distinction becomes particularly important where large energy requirements or other public-resource commitments must be planned before a facility is fully constructed or operating.

A represented future electricity requirement, for example, may depend upon financing, construction progress, network works, generation availability, equipment procurement, commercial commitments and commissioning milestones. Public infrastructure decisions may begin hardening before all of those dependencies have matured.

The same principle applies after approval.

A project does not remain validated merely because it was once approved.

Where a material operating representation changes, the evidentiary basis supporting the original decision should be reconsidered.

Recent Tasmanian data-centre development illustrates why that principle matters. Planning conditions for the Bell Bay project address the circumstances under which backup diesel generation may operate, while the underlying project has also required correction of previously reported generator numbers. Separately, Hydro Tasmania is assessing a substantial future electricity request associated with multiple facilities. These are different processes, but together they illustrate how project configuration, operating assumptions and resource requirements can evolve after initial representations are made.

Tasmania should therefore define material-change triggers prospectively.

Changes in electricity demand, energisation schedule, backup-generation use, water demand, cooling technology, site configuration, ownership, financing, network dependency, project phasing or operating conditions should be assessed against objective criteria determining whether an existing approval or reliance determination remains valid.

This is not an argument for continual reopening of settled approvals.

A well-designed revalidation standard does the opposite: it provides certainty by establishing in advance which changes are immaterial, which require notification, and which are sufficiently consequential to require renewed evidence.

PAG also recommends that public disclosure requirements distinguish between reported values and the status of evidence supporting them. Transparency is more useful when the public and Parliament can understand not only what has been represented, but whether a representation is demonstrated, conditional, superseded or pending revalidation.

The principle is straightforward:

The evidentiary threshold should rise with the consequence of reliance.

A representation supporting a major electricity commitment, public-resource allocation or long-lived infrastructure decision should face a stronger evidentiary threshold than an early-stage project estimate.

PAG’s recommendation would not replace planning, engineering, environmental, energy-market or legal review. Those disciplines generate essential findings.

The proposed Evidence & Revalidation Standard would provide the institutional layer above them: determining what conclusion the combined

evidence supports at a particular decision point and what subsequent material change requires that conclusion to be revisited.

Persistence Analytics Group respectfully recommends that the Committee consider this approach when developing recommendations for future legislation, regulation and parliamentary oversight of AI data centres in Tasmania.

Respectfully submitted,

Neil P. Osnato

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