

# Inquiry into AI Data Centres in Tasmania

Submission: disclosure, risk and oversight when the scale is systemic

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|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Submitter | Fernando Henrique Bacchereti, [REDACTED]                                                                                                                                                        |
| Date      | 21 September 2026                                                                                                                                                                               |
| Capacity  | This submission is made in a personal capacity. It does not represent the views of my employer or any office I hold.                                                                            |
| Interest  | I am developing an independent, source-linked public register of Tasmanian data-centre proposals. I have no financial interest in any data-centre proponent, energy company or water authority. |

Page references (“p.”) are to the printed page numbers of the Tasmanian Government’s Draft Expectations for Data Centres and AI Infrastructure Developers (September 2026), “the Draft Expectations”.<sup>1</sup> Numbered references are listed at the end, with how each figure used here was checked.

## 1 Summary

- 1.1 Tasmania is making long-lived decisions about electricity, water and network infrastructure on information that is voluntary, inconsistent and often incomplete. The Draft Expectations give useful direction, but they are non-statutory and leave public disclosure largely to proponents.
- 1.2 The scale is what makes this a matter for Parliament. The electricity requirements of publicly reported proposals already add up to roughly the same as Tasmania’s average grid demand in the most recent reported quarter (Figure 1). At that scale, disclosure stops being a project-level courtesy and becomes a question of system governance.
- 1.3 Drawing on my background in regulated banking under the Basel framework, I suggest that banking has already solved two similar problems: making disclosure standardised and comparable, and managing the risk that a large counterparty does not deliver. I also recommend that missing information be shown rather than omitted, that promises be distinguished from enforceable conditions, and that Parliament receive reporting when proposals cross defined thresholds. This submission takes no position for or against data centres.

## 2 Recommendations

| Recommendation                                                                                                                                                                                                                        | ToR 1 | ToR 3 | ToR 4 | ToR 5 | ToR 6 | ToR 7 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|-------|-------|-------|-------|
| 1 Legislate a mandatory, standardised disclosure regime for data-centre and AI facilities above a defined scale, covering forecast and actual electricity demand and water use, with every figure stating its basis, date and source. |       | ●     | ●     |       |       |       |
| 2 Establish a single government-maintained public register of proposals, showing each project’s stage and key figures, with figures not yet available recorded as “not publicly defined” rather than omitted.                         |       |       | ●     | ●     |       |       |
| 3 Require financial security, such as deposits or bank guarantees, for network and water works built ahead of demand, released in stages as demand materialises.                                                                      | ●     |       |       |       | ●     |       |

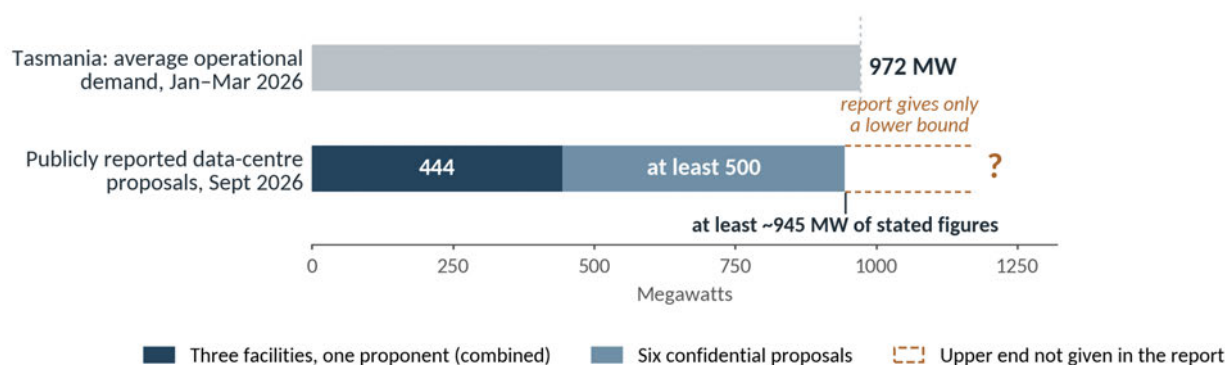
| Recommendation                                                                                                                                                                  | ToR 1 | ToR 3 | ToR 4 | ToR 5 | ToR 6 | ToR 7 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|-------|-------|-------|-------|
| 4 Consider clawback or step-down mechanisms where promised renewable generation, jobs or community benefits are not delivered.                                                  |       |       |       |       | ●     |       |
| 5 Seek advice on monitoring aggregate large-load commitments against a limit relative to the size of Tasmania's electricity and water systems.                                  | ●     |       |       |       |       |       |
| 6 Require public reporting to distinguish proponent commitments from enforceable permit or contract conditions, with periodic reporting to Parliament on delivery against both. |       | ●     |       |       | ●     |       |
| 7 Introduce reporting to Parliament triggered when a proposal exceeds defined thresholds of electricity demand or water use, with thresholds set on expert advice.              |       | ●     |       |       |       |       |
| 8 Align Tasmania's disclosure requirements with the national framework under development, without delaying state action where it is needed now.                                 |       |       |       |       |       | ●     |

Table 1. Recommendations mapped to the Committee's Terms of Reference.<sup>2</sup> Term of Reference 2 (the Resource Management and Planning System) is not addressed in this submission.

### 3 Why the scale makes this a system question

- 3.1 In January to March 2026, operational demand on Tasmania's grid averaged 972 MW, according to the Australian Energy Market Operator.<sup>3</sup> That quarter falls in summer, and Tasmania's demand peaks in winter,<sup>4</sup> so this was not the season of highest demand.
- 3.2 Against that, public reporting in September 2026 described three facilities by one proponent with a combined requirement of 444 MW, six confidential proposals that would together use at least 500 MW, and a separate facility of about 1 MW.<sup>5</sup> The stated figures alone come to at least about 945 MW.

Figure 1. Reported data-centre proposals against Tasmania's average grid demand



Sources: AEMO, *Quarterly Energy Dynamics Q1 2026*;<sup>3</sup> ABC News, 9 September 2026, reporting a document tabled in Parliament.<sup>5</sup> The approximately 1 MW facility is too small to show. Average rather than peak demand is used because facilities of this kind are built for high availability (Draft Expectations, p. 11). This is not a forecast: proposals may be staged, may be alternatives to each other, or may not proceed.

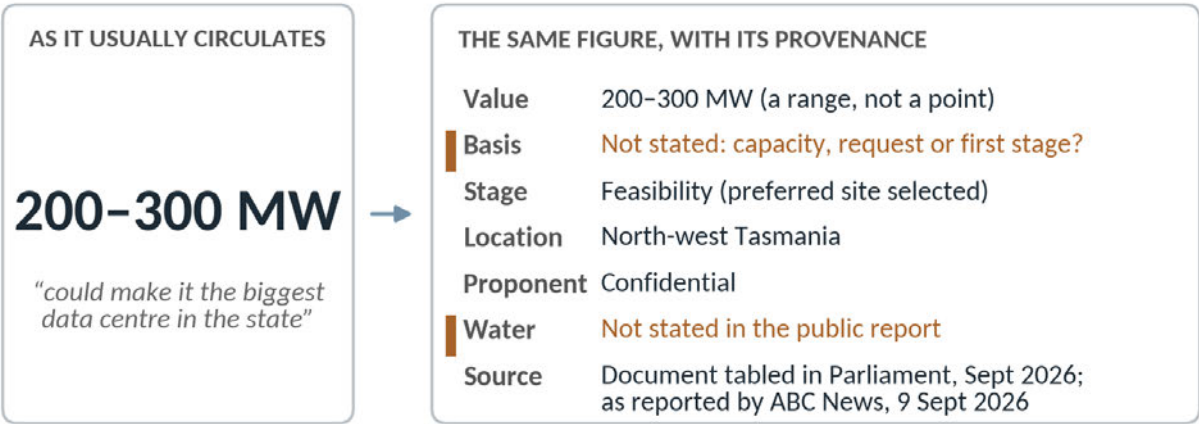
- 3.3 This comparison must be read with care, and the caveats are themselves the point. The public reporting of these figures does not state whether they describe design capacity, a connection request or a first stage, and for the six confidential proposals together it gives only a lower bound. Parliament cannot currently tell which of these readings is correct. That is a disclosure problem before it is an

energy problem.

4 Disclosure should be mandatory and standardised

- 4.1 The Draft Expectations describe themselves as a non-statutory statement of policy that does not create a new approval or regulatory process (p. 3). On transparency beyond existing statutory obligations, proponents “should consider publishing” non-sensitive information about forecast and actual energy and water use (p. 15).
- 4.2 Banking has faced this problem. Under Pillar 3 of the Basel framework, banks publish prescribed disclosures of their risk exposures and capital on a regular schedule. In 2015 the Basel Committee revised Pillar 3 to use standard templates with fixed definitions, specifically to make disclosures comparable across banks and over time.<sup>6</sup> Because every bank reports the same items the same way, supervisors and the public can compare institutions and track change.
- 4.3 There is also a data-centre precedent. Since 2024 the European Union has required operators of data centres with installed IT power demand of at least 500 kW to report annually to a common database, including energy use, water use, renewable energy and waste-heat indicators.<sup>7</sup> The EU publishes this only in aggregate. Given the scale set out in Section 3, I suggest Tasmania needs disclosure at the level of each project.
- 4.4 The requirement need not be complex. Every published figure should carry its **basis**, its **date** and its **source**. Figure 2 shows why, using a figure from the public record.

Figure 2. One publicly reported figure, with and without its provenance



Source: ABC News, 9 September 2026, reporting a document tabled in Parliament.<sup>5</sup> Fields shown in ochre are not stated in the public report. The proponent is not named because it has not been disclosed.

5 Large-load connections as credit exposures

- 5.1 The Draft Expectations recognise the need to protect existing customers from “inappropriate cost shifting and stranded asset risk” (p. 7), and state that proponents must pay their fair share of network costs so there is “no net cost on existing Tasmanian customers” (p. 12).
- 5.2 In banking terms this is counterparty risk. When publicly owned infrastructure is built for a single large customer, the public carries exposure to that customer’s performance. I offer the following established tools as options for the Committee to consider, not settled answers:
  - **Security:** deposits or bank guarantees covering works built ahead of demand.

- **Staging:** commitments released in tranches as milestones are met.
- **Clawback:** recovery or step-down provisions if promised generation, jobs or benefits do not materialise.
- **Concentration limits:** banks cap their exposure to any single counterparty relative to their capital. The equivalent question for Tasmania is how much aggregate large-load commitment its systems should carry relative to their size. Figure 1 suggests the question is not hypothetical.

## 6 Missing figures must be visible

- 6.1 The Draft Expectations state that proponents must provide project-specific forecasts of maximum and average annual water demand (p. 13). Yet the document tabled in this Parliament in September 2026, as reported by ABC News, explained that information was left out where it was not yet available, not sufficiently settled, not capable of reliable estimation, or provided in confidence.<sup>5</sup>
- 6.2 Those are legitimate reasons. But when a figure is simply absent, readers cannot tell which reason applies, or whether anything is missing at all. I recommend that a public register record each unavailable figure explicitly as “not publicly defined”, with the reason where it can be given. A gap is information: it tells Parliament and communities what has not yet been disclosed, gives consultation participants a precise question to ask, and makes it visible the moment the figure is published.

## 7 Commitments versus conditions

- 7.1 Proposals often include statements about jobs, training, renewable generation and community benefits. Some become enforceable through permit conditions or contracts; others remain statements of intent. The Draft Expectations require independent verification for renewable energy commitments, which must be shown to be “genuine and independently verifiable” (p. 10), but not for other kinds of commitment.

Figure 3. From statement of intent to reported delivery



*Draft Expectations p. 10: required for renewable energy commitments only*

Public reporting should show which step each commitment has reached. Recommendation 6 asks that Parliament receive periodic reporting on delivery against both commitments and conditions.

- 7.2 Without that distinction, a promise can be understood as a guarantee.

## 8 Threshold-based oversight

- 8.1 Oversight is most useful when it is proportionate. I recommend that reporting to Parliament be triggered when a proposal exceeds defined thresholds of electricity demand or water use. I do not propose specific numbers; the Committee may wish to seek advice from system operators and regulators. Scale-based triggers already exist: the Draft Expectations exclude small-scale edge and on-site enterprise facilities from their scope (p. 3), and the EU reporting obligation applies from 500

kW of installed IT power.<sup>7</sup>

9 National alignment

- 9.1 The Draft Expectations note that the Australian Government published its own expectations in March 2026 (p. 3), and that a proposed national framework is anticipated to cover power, grid connection, energy efficiency and water use, with mandatory requirements yet to be finalised (p. 15).
- 9.2 Tasmanian requirements should align with that framework so that proponents report once, in comparable terms, across jurisdictions. Alignment should not mean delay: where decisions about Tasmanian infrastructure are being made now, state requirements should apply now and be adjusted if a national standard is settled.

10 Closing

- 10.1 I thank the Committee for the opportunity to contribute, and I would be willing to appear as a witness if invited.

References

1. Tasmanian Government (Building Tasmania). *Draft Expectations for Data Centres and AI Infrastructure Developers: Tasmania*. September 2026. Consultation open to 12 October 2026. [engage.building.tas.gov.au/draft-expectations-data-centres-and-ai-infrastructure-developers](https://engage.building.tas.gov.au/draft-expectations-data-centres-and-ai-infrastructure-developers)

2. Parliament of Tasmania, House of Assembly Standing Committee on Government Administration A. *Inquiry into AI Data Centres in Tasmania: Terms of Reference*. Resolution of 5 August 2026. [parliament.tas.gov.au](https://parliament.tas.gov.au)

3. Australian Energy Market Operator. *Quarterly Energy Dynamics Q1 2026*. April 2026. [aemo.com.au/-/media/files/major-publications/qed/2026/qed-q1-2026.pdf](https://aemo.com.au/-/media/files/major-publications/qed/2026/qed-q1-2026.pdf)

4. Australian Energy Market Operator. *Maximum and minimum demand* (Electricity Forecasting Insights). Tasmania is described as a winter-peaking system driven by heating load. [aemo.com.au](https://aemo.com.au)

5. Barraclough, A. "Six new AI data centres proposed for Tasmania, but companies behind them are being kept secret." ABC News, 9 September 2026. [abc.net.au/news/2026-09-09/six-new-confidential-data-centre-proposals-tasmania-revealed/107131974](https://abc.net.au/news/2026-09-09/six-new-confidential-data-centre-proposals-tasmania-revealed/107131974). Reports a document tabled by the Government in the House of Assembly.

6. Basel Committee on Banking Supervision. *Revised Pillar 3 disclosure requirements*. 28 January 2015. [bis.org/bcbs/publ/d309.htm](https://bis.org/bcbs/publ/d309.htm)

7. Directive (EU) 2023/1791 (Energy Efficiency Directive), Article 12; Commission Delegated Regulation (EU) 2024/1364. See Government of Ireland, *Data Centre Energy and Sustainability Performance Reporting Obligations* ([gov.ie](https://gov.ie)), and Finnish Government, press release of 14 October 2024 ([valtioneuvosto.fi](https://valtioneuvosto.fi)).

How the figures in this submission were checked

| Figure or claim                                         | Source | Type                              | Checked                                  |
|---------------------------------------------------------|--------|-----------------------------------|------------------------------------------|
| Quotations and page numbers from the Draft Expectations | Ref. 1 | Primary, government               | Against the PDF                          |
| Terms of Reference                                      | Ref. 2 | Primary, Parliament               | Against the published resolution         |
| 972 MW average operational demand, Q1 2026              | Ref. 3 | Primary, market operator          | Against the report text                  |
| 444 MW; at least 500 MW; about 1 MW; 200–300 MW         | Ref. 5 | Media report of a tabled document | Tabled document itself not yet consulted |
| Pillar 3 revision and purpose                           | Ref. 6 | Primary, standard-setter          | Against the BIS publication page         |
| EU 500 kW reporting obligation and indicators           | Ref. 7 | Government guidance               | Against two member-state sources         |

No figure in this submission has been estimated, modelled or inferred. Where a value is not publicly available, it is described as such.