



Yass Landscape Guardians Inc.

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NSW Department of Planning Housing and Infrastructure
4 Parramatta Square
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Dear NSW Department of Planning Housing and Infrastructure

On behalf of the Yass Landscape Guardians Inc. I wish to raise our concerns for this project SSD-40138508. The Baldon Wind Farm and battery Facility if approved is to be constructed by CCP owned Goldwind and its associate Omni Wind within the South-West REZ? With the current lack of **compulsory decommissioning legislation** for so-called renewable energy project across Australia, and you, the NSW DPHI as the approving body for the Baldon Wind Farm need to be aware of capacity of any TransGrid transmission line that Goldwind intends connecting their Baldon industrial wind generation project to? See below;

1. **No compulsory decommissioning legislation in NSW**

Decommissioning and end of life rehabilitation, Goldwind and Omni Wind claim that they will be decommissioning their Baldon and Battery Storage Facilities wind turbines and at end of life? Reference Baldon WIND FARM *Frequently Asked Questions "verbatim" Section 8 Once the wind turbines have reached their end of usable life, the wind turbine would be decommissioned and removed (and recycled), or the wind farm may be refurbished and repowered. If the wind farm is to be decommissioned, the land would be rehabilitated and returned to its original use. The decommissioning process, and decommissioning process is an important part of the development process, and decommissioning and rehabilitation objectives are required to be met as part of the Development Consent, outlined by the NSW Department of Planning and Environment.*

Realistically Goldwind will not own this project at the very end when any decommissioning rehabilitation is needed in as little as a decade or perhaps a little over so who will enforce decommissioning and rehabilitation?

Without **Compulsory Decommissioning Legislation** in NSW the unsuspecting host of this environmentally detrimental project will be left with the clean-up and rehabilitation?



Why are these so-called renewable energy projects ever approved when its universally known by the majority of thinking Australians that in all Eastern Australian states there is **No Compulsory Decommissioning Legislation?**

If such legislation was in place the original Crookwell Wind Farm constructed in 1998, even though the Upper Lachlan Shire Council where the approving authority at the time should have been decommissioned already as has been the case of the Western Australian Esperance Wind Turbines of a very similar vintage?

Decommissioning wind turbines.

The employees of the NSW Department of Planning, Housing and Infrastructure have to be aware that there is now no compulsory decommissioning legislation for any so-called renewable energy project, Australia wide?

Therefore, so-called wind farm lease agreements are not regulated by Government.

Thus, there is no compulsory bond set aside for decommissioning any so-called renewable energy project?

Even if decommissioning clauses are in place in any contract with the first proponent or developer and the host landholders of any so-called renewable projects these companies very quickly morph into \$2-00 "shell companies" with no financial fortitude to decommission their assets at end of life?

Therefore, invariably the cost of decommissioning falls to the host landholder?

Yet the likelihood of a host landholder, especially an absentee landholder decommissioning any wind turbine is slim for the following reason?

Below in figures for today 3 wind turbine decommissioning cost scenarios;

1. The NSW Planning Housing and Infrastructure estimated conservatively in February 2024 that to decommission a larger wind turbine, (Baldon turbines are 300M) then with a figure estimated by NSW Department PHI of \$563,132 per turbine. Thus, to decommission a project such as Baldon wind turbine development with a projected number of 180 wind turbines, equates to a total of \$101,363,760. **NB THIS IS YOUR DEPARTMENT?**
2. Reading the Weekly Times 9th August 2024 the law firm McCullough and Robertson estimate between \$450,00 to \$600,000 per turbine to decommission. Using the higher figure proffered by McCullough and Robertson then the figure here of \$600,000 to decommission 180 300M blade tip height turbines in the Baldon wind turbine development then the total cost would be \$108,000,000.
3. I would suggest that the above figures are probably conservate across the board? With wind turbine decommissioning figures of \$800,000 to \$1,000,000 per turbine now being proffered. Working with the lower of these 2 figures and Baldon 180 wind turbines we achieve a figure of \$144,000,000.

These massive figures do not include decommissioning and rehabilitation of the associate Baldon battery facility?

Any of the above wind turbine decommissioning scenarios are an extremely large sum of money to come up with even today? With ever rising inflation, labour and mechanical cost escalating these figures would rise exponentially?



Even if these monstrous turbines are decommissioned a total of 180M tip height wind turbines and “dead” Lithium-Ion filled batteries will create a massive land fill issue?

Without Compulsory Decommissioning Legislation for any “so-called renewable energy project” who picks up the decommissioning cost of a project such as Baldon wind turbine development and battery facility at its end of life? The community or a governmental body? Unfortunately, ultimately the Australian taxpayer?

The reality here is that these wind turbines at a height of 300 Metres will highly likely incur even higher decommissioning costs than those proffered above? Something for the staff of the NSW DPFI to consider?

The NSW DPFI need to be aware that they will by approving the Baldon wind turbine and battery storage development will essentially be approving an installation with no end date?

2. **High voltage grid connection. The question has to be asked**, does the high voltage connection point have the capacity for Omni Wind and Goldwind’s Baldon Wind Generation Works? The mooted associated 220KV transmission line has an estimated maximum capacity of 300MW? Therefore, if this transmission line is already transferring power, it lacks capacity to accept virtually any generation from Goldwind’s Baldon wind turbine project?

Under the auspices of the former NSW Department of Planning the following 2 wind turbine projects where approved?

2 examples of the relevant NSW DPE and IPCs approving a project to connect to a nearby high voltage transmission line that lacked capacity were, the Bango Wind Turbine project approved by the Bango Wind farm IPC to connect to the 999 Yass Cowra 132KV transmission line. The TransGrid 999 lacked capacity to accept further generation, especially the mooted 244MW claimed by Squadron Energy?

The second of these mismanaged approvals is another Goldwind project is the Coppabella Wind Farm IPC November 2018 approved the Coppabella wind turbine development to connect to the existing 132KV transmission line the 99M Yass Murrumburrah 132KV transmission line. Known was that this transmission line had a maximum capacity of approximately 29MW on a cold winter’s night? A far cry from the claimed 284MW that Goldwind claim for Coppabella.

Eventually TransGrid and Goldwind jointly announced that the 99M 132KV transmission line lacked capacity and thus the 99M 132KV transmission line would need duplication to a new 132KV transmission line the 9R0 on the same yet replaced and taller structures for 39 kilometres back to the Yass 330/132KV substation. Estimated cost late 2019 \$40 million.

Later still Goldwind announced that they needed to fund a new 132KV step-up to 330KV transformer at the TransGrid Yass 330/132KV substation. The “sheepish” reason given was that the 132KV busbar at the TransGrid Yass 330/132KV substation lacked capacity. Estimated cost then another \$40Million.

Since that figure was proffered by Goldwind, it has been announced that AEMO and or TransGrid have asked Goldwind to install a Static Synchronous Compensator (STATCOM) as part of the upgrade of the TransGrid Yass 330/132KV substation.

Now Goldwind are “hiding” behind business confidentiality?



Therefore, we are looking at an additional and hidden and yet unannounced transmission line from the Baldon industrial wind turbine/battery storage facility so that Goldwind and Omni Wind can deliver generation from their wind driven generators to the higher voltage “pool”? Yet more taxpayer and power consumer funding for a **marginal** project?

Besides this the partially constructed Energy Connect transmission line that all these so-called renewable energy generation sites from the South West REZ are relying on to partially transfer any generation hundreds of kilometres to the East Coast Load Centres sections of EnergyConnect is only being constructed as a 330KV transmission line? From my knowledge a 330KV transmission line has a maximum transfer capacity of 1000MW .

According to Wikipedia the actual transfer capacity of Energy Connect is actually less than the above figure? Wikipedia informs us that the transfer capacity of the 330KV section of Energy Connect is 800MW. Even as a double circuit option which Energy Connect is, if as Wikipedia tells us the 330KV sections will only transfer 800MW per circuits maximum? Therefore how much power can be sent to Eastern Coast Load Centres via 2 800MW transmission lines when Baldon is quoted as being able to produce 700MW, this outputs "soaks up" the capacity of 1 of those parallel lines thus the extra so-called renewable energy sources planned for the Western Riveriana then the second 330KV transmission line

will only transfer power from extra "Baldon wind and Battery facility?" Therefore, I ask how many 700 MW industrial scale pseudo generation installations such as Baldon can be connected to Energy Connect? Essentially meaning projects such as Baldon Wind and Battery Storage Facility along with the 330KV Energy Connect are “WHITE ELEPHANTS” even before these projects are completed?

Therefore, on behalf of Yass Landscape Guardians Inc, I implore the NSW Department of Planning Housing and Industry to not approve Baldon Wind Turbine and Battery Storage.

Please do not approve this projects' commencement without a secure pathway for delivering generation to the national energy grid as has happened with the Bango Wind Turbine development (point of connection to TransGrid changed after project started construction), and is likely to happen with the Coppabella wind turbine development. The later is another Goldwind development.

Best regards John McGrath

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