



1 February 2024

Iwan Davies
Director
Energy Assessments
Department of Planning, Housing and Infrastructure
GPO Box 3145
Singleton NSW 2330

Subject	Request to Marginally Exceed 400MW Capacity due to Technology and Performance Enhancements
Project	Orana Battery Energy Storage System
Application Number	SSD-45242780
Determination Date	22/12/2023

Dear Iwan,

Akaysha Energy is requesting approval from the NSW Department of Planning, Housing and Infrastructure to increase the total delivery capacity of the Orana Battery Storage project above those currently set out in the project's Development Approval.

BATTERY STORAGE RESTRICTION

A5. Unless the Planning Secretary agrees otherwise in writing, the battery storage associated with the development must not exceed a total delivery capacity of 400 MW.

In line with the above, Akaysha Energy requests permission to exceed the total delivery capacity approved in Condition A5 of the Development Approval from 400 MW to facilitate an increased total delivery capacity of 415 MW.

The Response to Submissions defines the Orana Battery Energy Storage System (Orana BESS) Project to have "a capacity of approximately 400MW". During the course of the Development Application, enhancements to BESS technology and performance are such that 415MW can be achieved within the same development footprint and also delivered in accordance with the EIS, without introducing any additional hazards. Indeed, DPHI's Energy Assessment and Hazards Teams have already advised a relatively small increase in installed capacity wholly within the Development Footprint would not require further assessment.

As an aside and by way of an analogy, applying this same logic to an Electric Vehicle would result in these same enhancements to BESS technology and performance simply increasing the range of the vehicle only. It's dimensions, visual appearance, ANCAP Safety Ratings etc remain unchanged. This increase in capacity at Orana is less than 4% and we believe within reasonable tolerances given the lead times of these projects and that meaningful procurement with Battery suppliers cannot occur until a DA has been obtained. Such technological advancements are commonplace in storage projects throughout the development lifecycle as the technology is relatively new and OEMs seek a competitive advantage.

Orana Battery Energy Storage System
Akaysha Energy

The Orana BESS project has also made binding commitments to NSW Government via the Long-Term Energy Service Agreements (LTESA) after winning the competitive tender processes to support the build of a 415MW system. A limitation on the project to not exceed 400MW would impact the projects ability to honour this LTESA contract and the programs stated objectives of *“bringing forward investment in new sources of renewable generation and storage, supporting more affordable energy for consumers”*.

Following award of the DA on 12 December 2023, and in line with our LTESA commitments, Akaysha Energy is expediting the project at pace. For your information, we have now engaged an EPC Contractor on early works and will be conducting a Jobs & Skills Fair (in partnership with ICN) in the region in March. Our Contractor is now preparing the requisite Management Plans and also the designs for the Goolma Road upgrades, which we intend to submit to DPHI for approval shortly. We have also commenced certification and registration of the subdivision in order to transact on the land acquisition ASAP, the Planning Agreement has essentially been finalised with Dubbo Regional Council and we are making good on our commitments to finalise the Neighbour Agreement without delay. As such, we are confident of Financial Close in Q2 2024.

Request to marginally exceed 400MW capacity

We respectfully request that the Planning Secretary consent to an increase in the Battery Storage capacity stipulated in Condition A5, from 400MW to 415MW, as outlined herein.

Akaysha Energy looks forward to your timely consideration of this request.

Yours sincerely,



Tim Hoban

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