

19 September 2019

Nicole Brewer
Acting Director
Energy Assessments
Department of Planning, Industry and Environment
320 Pitt Street | GPO Box 39 SYDNEY NSW 2001

Dear Nicole,

RE: Uungula Wind Farm (SSD6687) | Secretary's Environmental Assessment Requirements

Further to our meeting with the Department of Planning, Industry and Environment (DPIE) on 17 September 2019, CWP Renewables on behalf of Uungula Wind Farm Pty Ltd (the Proponent), are consulting per the requirements of the Environmental Assessment Requirements (EARs) for the Uungula Wind Farm (the Project) issued December 2016. The purpose of the letter is to obtain confirmation that the EARs remain valid for the Project Environment Impact Statement and to obtain any additional EARs for added Project components (such as the Battery Energy Storage System (BESS)).

Despite the revised scope of the proposed Development (discussed below), it remains materially consistent with what is described in the Preliminary Environmental Assessment (CWP Renewables 2016). Following further design, consultation and assessment, the scope of the Project has been amended as follows:

- Construction of up to 109 wind turbine generators (WTGs), a reduction of 140 WTGs from the proposed 249 WTGs originally proposed;
- Reduced project extent and revised WTG layout as shown in Attachment A;
- An increase in maximum tip height to 250m from 200m (subject of previous consultation with the DPIE); and
- Addition of an optional BESS (details of which are described below).

DPIE has been previously advised of these alterations and the environmental Impact Statement (EIS) has been substantially prepared in accordance with the requirements of the EARs. It is our view that there has been no material change to the assessment requirements as a result of the revised scope of the proposed Development and the EARs remain current and valid.

Previous consultation with DPIE in late 2018 notified DPIE of the proposed increased tip height as well as obtaining confirmation from OEH that the Project would be assessed under the Framework for Biodiversity Assessment (if submitted prior to mid-2020).

Battery Energy Storage System

The Proposed Development incorporates an optional BESS located in a Battery Facility which would enable electricity generated by the project or taken from the National Energy Market (NEM) grid to be stored for later dispatch to the NEM grid. **Attachment A** shows the proposed layout which includes optionality for the BESS location.



The quantity and type of battery technology to be used will be subject to detailed design and procurement processes planned for post-approvals, however a range of technologies may be considered in the EIS if they could potentially be used in the project. The most likely technology for the BESS is lithium-ion, as this is the prevalent large-scale BESS in market deployment at this time.

Storage Capacity and Land Area

The electrical capacity of the BESS is not certain at this stage (again, subject to detailed design and procurement processes) however it is anticipated to be in the order of 150MW. The maximum possible electrical capacity will be assessed in the EIS. The BESS will be located in a Battery Facility (refer to **Attachment A** for the proposed location) which is proposed to be approximately 150m x 150m. The EIS studies will guide the location and size of the Battery Facility.

Impact Assessment Process

To address the potential risks and impacts from the BESS the EIS will contain a preliminary risk screening in accordance with *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33* (DoP, 2011). If the preliminary risk screening indicates the development is "potentially hazardous", a Preliminary Hazard Analysis (PHA) must be prepared in accordance with *Hazard Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis* (DoP, 2011) and *Multi-Level Risk Assessment* (DoP, 2011). In addition, the EIS will include an assessment of all potential hazards and risks as they relate to the BESS (and the project as a whole), including but not limited to bushfires and spontaneous ignition (among other matters).

It is requested that DPIE confirm the adequacy of the EARs for the proposed Development and if required issue an addendum to the EARs. As it is intended to submit the EIS to the DPIE December 2019 it is requested that a response, and if required amended EARs, is issued promptly.

We look forward to your feedback on these matters.

Yours sincerely,

Matthew Flower

Development Manager

CWP Renewables Pty Ltd

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Attachment A: Revised Project Extent



