

NREN NATIONAL RATIONAL ENERGY NETWORK

NATIONAL RATIONAL ENERGY NETWORK INCORPORATED

To protect and advance public welfare and the natural environment by opposing Commonwealth, State or Territory Law, or Corporate actions, that impose counterproductive energy policies and costs on all citizens.

**nren.chair@gmail.com
<https://www.nren.com.au/>**

- Dubbo is in the Central West Orana Renewable Energy Zone to be surrounded by ~52 planned and under construction wind and solar projects, not including smaller projects managed at LGA level (See attachment).
- These 52 projects total ~15GW of installed generating capacity.
- Significant domestic rooftop solar is also installed in the CWOREZ.
- NSW is the largest load on the Eastern Grid and consumes at most ~11.5GW at any time.
- The CWOREZ is just one of several REZ promulgated for NSW, that will be similarly overbuilt.

- Despite being surrounded by 15GW+ of installed wind and solar plus numerous BESS, the prior approval of SSD-28088034 confirms a need for gas 'firming' to ensure a reliable supply of electricity.
- This identified need starkly highlights the ineffective and unreliable nature of large industrial wind and solar.
- Enlargement of the project, MOD-1, from 64MW to 180MW further contradicts the 'reliable' (sic) political messaging.
- Firming unreliable wind and solar with open cycle gas turbines – the least efficient type – is in conflict with the stated aim of reducing CO2 emissions.
- MOD-1 includes the use of compression-ignition piston engines, compounding the admission that wind and solar are ineffectual at their stated primary task, as well as further adding to production of CO2.
- The NEL Objectives (shown below) do not prioritise emission reduction over the other longstanding objectives of 'price, quality, safety and security'. These objectives must be at least equal in priority when assessing novel power generation projects.
- The NEL Objectives were only amended to add emissions targets (c) as an objective in September 2023.

National energy objectives

The National Electricity Objective (NEO)

The National Electricity Objective as stated in the [National Electricity Law \(NEL\)](#) is:

“to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to:

- a. price, quality, safety, reliability and security of supply of electricity; and
- b. the reliability, safety and security of the national electricity system; and
- c. the achievement of targets set by a participating jurisdiction—
 - i. for reducing Australia's greenhouse gas emissions; or
 - ii. that are likely to contribute to reducing Australia's greenhouse gas emissions.”

The National Energy Retail Objective (NERO)

The National Energy Retail Objective as stated in the [National Energy Retail Law \(NERL\)](#) is:

“to promote efficient investment in, and efficient operation and use of, energy services for the long term interests of consumers of energy with respect to:

- a. price, quality, safety, reliability and security of supply of energy; and
- b. the achievement of targets set by a participating jurisdiction—
 - i. for reducing Australia's greenhouse gas emissions; or
 - ii. that are likely to contribute to reducing Australia's greenhouse gas emissions.”

The National Gas Objective (NGO)

The National Gas Objective as stated in the [National Gas Law \(NGL\)](#) is:

“to promote efficient investment in, and efficient operation and use of, covered gas services for the long term interests of consumers of covered gas with respect to:

- a. price, quality, safety, reliability and security of supply of covered gas; and
- b. the achievement of targets set by a participating jurisdiction—
 - i. for reducing Australia's greenhouse gas emissions; or
 - ii. that are likely to contribute to reducing Australia's greenhouse gas emissions.”

- When coupled with the publicised cost blowouts of the CWOREZ project itself, Snowy Hydro 2, Humelink, Project Energy Connect and VNI West, to name a few, it is clear why

our power prices have exploded upwards.

- Also public knowledge is the increased interventions annually by AEMO (over 1800 in 2025) to stabilise the grid, which would only happen if the quality and reliability of the power supply is deficient.
- All the above indicates strongly that currently NONE of the NEL Objectives are, or will ever be, met using novel, inefficient and erratic power generation methods.
- Not only should Dubbo Firming MOD-1 be rejected, the whole CWOREZ itself should be cancelled as failing the NEL Objectives and being counterproductive to the stated aim of reducing emissions.
- Instead, a modern coal thermal power station should be built at the coal-head near Ulan making use of the 500kV transmission currently under construction from Wollar.

Grant Piper
Chair
NREN Inc.
Uarbry Tongy Lane Alliance Inc.
Vice-Chair
CWOREZist Inc.