



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.

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Wallaby Creek Wind Farm (SSD-60247211)

- Wind power reliability and conversion is grossly inefficient and only produces on average 29% of its installed capacity according to AEMO 2022 data. 29% is two days a week.
- If approved, DPHI must define dispatchable power performance standards (Capacity Factor) to be met by Wallaby Creek, in line with CSIRO GENCOST modelling of above 40%, with penalties for underperformance?
- With a short working life of maybe 20 years and the loss in efficiency over time, wind turbines will have to be replaced 3-4 times during the life of a conventional thermal power station, incurring multiple whole-of-life emissions as well as further local environmental degradation and economic cost.
- Battery storage produces no power at a high environmental cost, due to the sunk energy and

materials used in their manufacture, and their even shorter working life than wind turbines.

The short life again incurs a recurring remove and replace environmental and emissions cost. Uncontrollable battery fires are another serious hazard to the local community.

- Due to the distributed nature of solar and wind, additional transmission lines are needed, which further adds to the environmental cost, and which until now have been unnecessary.
- All this leads to the conclusion that wind turbine projects like this one are counterproductive to the stated aims of cheap, reliable and environmentally friendly power, let alone reducing greenhouse gas emissions.
- The CWOREZ is approved for 4.5GW dispatchable power with expansion to 8GW in planning. There are ~50 projects listed for the REZ so far totalling over 14GW, comprising of ~1000 wind turbines and 9 million solar panels, plus numerous BESS. For perspective the whole of NSW consumes 8-11GW at any time, yet in one REZ we may have 14GW alone, and this is only one of several REZ.
- The Department must consider this massive overbuild and the economic and environmental cost due to this gross inefficiency.
- Squadron has an approved project to install a gas turbine at Dubbo, which shows the planning authorities know that despite Dubbo being surrounded by 14GW of installed capacity, a gas turbine will still be needed.
- What conditions is the Department imposing on ACCIONA to ensure the operating

company does not disappear leaving decommissioning and cleanup costs to landowners and taxpayers?

- We cannot trust the NSW Government's intentions regarding farming and food production. The NSW Emissions Reduction Act 2023 which is touted to codify the 2015 Paris Agreement principles, excluded the proviso '... low greenhouse gas emissions development, in a manner that does not threaten food production'. (Article 2 (1)(b) cf. Section 3(1)(c)).
- GENCOST and AEMO ISP are deficient and cannot be quoted as reliable information in regard to least-cost or most efficient development pathway. Both have been debunked by experts and organisation working in this field.
- The NEL (section attached separately) does not prioritise emission reduction over the other longstanding objectives of 'price, quality, safety and security'. The IPC must consider these objectives equal in priority when assessing novel power generation projects such as Spicer's Creek..
- The NEL was only amended in September 2023 to include emissions targets as an additional Objective, and even then hedged their bets by included the phrase '...likely to contribute to reducing.....emissions'. It does not sound like the legal advice was confident that these projects **would** reduce emissions, and so they included a legal 'out' for future indemnity when the current Government policy is finally publicly acknowledged to be absurd, destructive and counterproductive.
- The Department must consider the whole-of-lifecycle emissions of the project, not just the

'fuel' component. This calculation would include raw materials mining, transport, manufacture, installation, decommissioning, any recycling emissions and the multiple replacements needed per the above, not just the operating emissions. The Department should provide their calculation of the total emissions in their report to the Minister.

- ACCIONA is here to take advantage of our generous subsidy scheme for wind turbines.
- Aviation Projects, the proponent's aviation consultant, has once again acted deceptively by unilaterally assessing that obstacle lighting will not be required to keep the issue of flashing obstacle lights out of the EIS. Thus the proponent avoids objections from the public on a sensitive topic. Aviation Projects is well aware that all recently approved wind projects are required to have obstacle lighting.
- Aviation Projects has not consulted with or tried to inform any of the Sport or General Aviation users of Narromine about the project. 271M (890ft) turbines will be a significant hazard to light aircraft traffic between Cowra, Temora, Parkes and Narromine.
- Narromine is a premier gliding centre with regular competitions, both National and International.
- Wind projects such as the Wallaby Creek project have no electrical power engineering merit, economic justification, nor environmental benefit, and should not be approved without stringent performance standards and heavy oversight.

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