

I **object** to the planned industrial BESS by VENA Energy.

The EIS fails to satisfy relevant SEARS requirements.

The developer has failed to provide a detailed evaluation of the merits of the project as a whole and a detailed consideration of the capability of the project to contribute to the security and reliability of the electricity system in the National Electricity Market,

The EIS, on behalf of the developer, an Asia Pacific conglomerate recently acquired by Global Infrastructure Partners, asserts generally that

“once operational, the Bellambi Heights BESS will provide a valuable contribution to the energy security of NSW and the east coast of Australia... (it will) provide dispatchable capacity to support renewable energy generation in the NEM support and enable new renewable energy projects, which are crucial to replace coal fired generation capacity and provide additional capacity to the NEM, and will provide broader security to the grid by providing back-up power during network disruptions.

This is a broad assertion which is unsubstantiated by the developer. The developer should be **required to specify** and **justify** how two, 204 MW (two hour) BESS generating units, and energy storage capacity of approximately 816 megawatt hours (MWh) (approximately **two hours** of storage) can constitute a **valuable contribution to the energy security of NSW and the east coast of Australia**. In so doing, it needs to deal with the fact that as a BESS is continuously operated, its annual output will decline as the battery efficiency reduces.

On its face, this project fails the merits test required by the SEARS.

The developer has failed to provide any specifics of the following assertion:

“The project is supported by Commonwealth, State, regional and local plans and policies and will support the Commonwealth and State governments to achieve their respective renewable energy and GHG emission reduction targets”

The developer should be required to provide details of:

- The extent precisely to which this project will support GHG emission reduction targets taking into account the emissions generated in the construction of the development, the emissions generated in the maintenance of the development and the emissions generated in the operation and subsequent decommissioning of the development as well as the emissions generated by the solar projects which the BESS is intended to support.
- The extent to which the BESS supports the requisite objects of the NSW *Energy and Utilities Administration Act* (with particular reference to Section 5 (e)) and the NSW Electricity Infrastructure Investment Act (Section 3).
- The extent to which the BESS supports the requisite objects of the National Electricity Law (specifically S.7 National Electricity (NSW) Law).

This EIS, as it stands, fails to substantiate, or even attempt to substantiate these matters. The development should not be approved.

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