

I object to this project.

Purpose of the project

The purpose of the project is *the need for additional transmission network capacity -*

With the rise in renewable energy generation, coal-fired generation is facing increasing market, financial and operating pressures. Coal-fired generation is withdrawing faster than anticipated (AEMO, 2022), due to large coal-fired power plants, such as the Eraring and Bayswater power stations, closing ahead of originally anticipated retirement dates (Eraring power station to close by 2025 and Bayswater power station to close by 2033). **As such, the NEM needs to identify and connect to new low emission energy generation sources prior to the retirement of coal-fired power to continue to have enough energy to meet future demand,** while meeting Australia's carbon emissions policy commitments.

The need for new and additional transmission capacity arises directly from the government policies which have pushed emissions reduction targets. The object of the exercise is emissions reductions.

The EIS cites the *NSW Transmission Infrastructure Strategy* as the strategy driving the energy transformation. The existing network was **“not capable of transferring the scale of new electricity generation identified for the Central-West Orana REZ Development of new electricity generation and storage projects in the Central-West Orana REZ.”**

The EIS also cites the *State Infrastructure Strategy 2018-2038*. It asserts that

The project is aligned with the strategic objective for the energy sector within the strategy as it would provide the increased transmission capacity that is required to encourage private sector investment in low-emission energy generation projects within the Central-West Orana REZ in NSW.

This may be the case. **But it does not mean that the project complies with the *State Infrastructure Strategy* and in fact, it does not.**

State Infrastructure Strategy – Failure to specifically address and comply

The applicable State Infrastructure Strategy is that of 2022-2042.

Chapter 6 sets out the electricity sector's central role in achieving an orderly and efficient transition to net zero. 6.2 refers to the challenges associated with “scaling up the clean energy sector.” The Strategy asserts and recognizes **that infrastructure itself has “a key role to play in this transformation, due to the embodied, operating and enabled emissions generated throughout the infrastructure lifecycle.** Transport and stationary energy (direct combustion of fuels in mining, industrial, commercial and residential applications), *together with on-grid electricity generation, account for around 70% of NSW's greenhouse gas emissions.”*

The Strategy requires that new infrastructure measure and report in accordance with National Greenhouse Accounts. It requires that public infrastructure must measure and report how infrastructure-related decisions contribute to the State's total emissions and remaining carbon budget. Proponents must *“adopt global best practice and embrace industry-standard approaches to carbon accounting, disclosure*

and management.” Government agencies are charged with supporting the transition to low carbon infrastructure by ***“quantifying, valuing and disclosing the carbon contribution of the infrastructure.”***

There has been no attempt made by the proponent to quantify, value and disclose the carbon contribution of the project infrastructure. The proponent has not complied with the essential Strategy and the project should not be approved.

Should the proponent assert that the “low emission energy generation” enabled by the project is offset against its own high emission transmission infrastructure, then the proponent must assess also, **the embedded emissions in the infrastructure generation, storage and ancillary structures which the project enables.**

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