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.

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Bullawah Wind Farm (**SSD-50505215**)

143 x 300m turbines ~1GW installed capacity, 718MWh BESS

- 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. Can the proponent please tell us where we will get our power from the other five days of the week?

- What Capacity Factor is the proponent expecting? The CSIRO GENCOST modelling of 40% ?

- 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 unneccessary.

- 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.

- The SWREZ has an approved network capacity of 2.5GW, this project alone is ~1GW of installed capacity – what amount of overbuild/total installed capacity is expected in this REZ to be able to export 2.5GW? Pottinger is 0.75GW, The Plains 0.4GW, Baldon 1.4GW and Wilan 0.8GW totalling 4.35GW. For perspective the whole of NSW consumes 8-11GW at any time, yet in theSWREZ we so far have 5.35GW alone!

- The Department must consider this massive overbuild and the economic and environmental cost due to this gross inefficiency.

- The Department and Minister must impose conditions that guarantee the proponent 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 Emissons 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 proponent claims that this project will provide cheap and reliable power – technical analysis and experience in Australia nd overseas shows this is clearly not the case.

- The National Electricity Law (NEL) does not prioritise emission reduction over the other long standing objectives of 'price, quality, safety and security'. The NEL was only amended in September 2023 to include emissions targets as an additional Objective. The Department and Minister must consider these objectives equal in priority when assessing novel power generation projects such as this one.

- The Department must consider the whole-of-life emissions of the project, as the proponent has failed to do so. 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 demand these calculations from the proponent and make them public.

- The proponent is here to take advantage of our generous subsidy scheme for wind turbines, not to generate reliable and affordable power.

- Wind projects such as this project have no electrical power engineering merit, economic

justification, nor environmental benefit, and should not be considered let alone approved.

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