



Hunter Environment Lobby Inc.

202 High St
East Maitland NSW 2323
24.9.24

Proposed Hunter Power Project (Kurri Kurri Power Station) Modification 3 - Object

Hunter Environment Lobby (HEL) is a regional community-based environmental organisation that has been active for over thirty years on the issues of environmental degradation, species and habitat loss, degradation of rivers, riparian zones, groundwater destruction and climate change.

As we wrote in our original submission to this project on 9/6/2021 we know we are already experiencing the impacts of climate change and Australians have lived through a number of extreme weather events over the last several years, including the Black Summer bushfires, drought and intense heatwaves, major flooding and chaotic weather generally.

There have also been mass bleachings of the Great Barrier Reef and we are anxious about what this summer's heat will do to exacerbate this phenomenon. Gas, diesel and fossil fuels are driving climate change. Burning coal, oil and gas drives climate change. We believe we must urgently phase out all fossil fuels, if we are to avoid dangerous climate change effects.

Every time we expand or build new fossil fuel infrastructure, including gas or diesel power stations, we are putting more Australian lives and livelihoods in danger. We reminded the Department in the original submission in 2021 that there is no need for a new gas power station at Kurri or anywhere else, especially if the use of diesel is intended to increase by a factor of six to seven.

We also reminded this Department that AEMO's Electricity Statement of Opportunities 2020 report, found that New South Wales was not expected to exceed the Reliability Standard at any point to 2028-29. On the stricter Interim Reliability Measure, a capacity shortfall of just 154MW was identified after the Liddell power station closes in 2024.

Liddell has closed and Kurri Power is not built and seems no where near looking likely to be built and supplied by gas anytime soon? AEMO expected this small gap to be filled by "the New South Wales Government's commitment to provide capital projects funding to 170 MW of dispatchable capacity under its Emerging Energy Program". Not sure what happened but our grid is coping so far.

Once again, as we foretold, burning gas is a very expensive way to provide electricity. Australia's experts, including AEMO, don't foresee an increased role for gas on a pathway to a lower cost electricity grid. Existing gas power stations rarely turned on in

2020, NSW's gas power stations hardly turned on. They had a capacity factor of just 1.6%.

This is because gas power stations are struggling to compete with far cheaper energy sources like coal, wind and solar. Snowy Hydro already owns a large gas power station in New South Wales: the Colongra gas power station. WE ask again, if Snowy Hydro already own a gas power station that they hardly ever turn on, why do they want to build another?

Gas power stations can be unreliable- in February 2017, Snowy Hydro's existing Colongra gas power station failed to start due to low gas pressure in its supply lines, forcing AEMO to protect the grid by ordering the Tomago Aluminium Smelter to cut demand. This brings into question the claim that gas power stations can always act as a reliable backup.

As we reiterated in 2021, we already have clean and affordable alternatives to gas - batteries and pumped hydro can provide clean and affordable power. These are dispatchable technologies and batteries are being embraced by the private sector, with a number of projects planned in NSW already started. Snowy Hydro should invest in these technologies to help reduce New South Wales' emissions, improve grid security and put downward pressure on electricity prices.

Local impacts on air pollution by the use of diesel are serious. In the Modification 3 application, we find this section on increased emissions :-

Greenhouse gas emissions — The proposed modification would result in an about 80 per cent increase in greenhouse gas emissions compared to an update of the scenario for year 1 emissions presented in the EIS.

This is due to the combustion of diesel and because the proposed modification would entail an increase in the maximum number of operating hours during the first year.

Comparing the proposed modification to an update of the scenario for greenhouse gas emissions presented in the EIS for years 2 to 30 where the operating hours are the same, the proposed modification would result in 33 per cent increase.

As stated in our original submission, energy experts say we do not need another gas power station in NSW. Gas is expensive, and forcing households and businesses to use more of it will push up power prices. In recent years, the amount of gas power being used in the National Electricity Market has fallen dramatically and the Australian Energy Market Operator (AEMO) says it will continue to fall, because it is expensive compared with renewable energy paired with storage like batteries; and it is polluting.

Facing widespread criticism from independent experts who say gas subsidies are a bad idea, the government has ignored their advice, even [pressured them to change their analysis](#), and [paid millions for advice that suits its agenda](#).

The federal government's ad hoc and dangerous interventions in the energy market are even opposed by many gas companies. The government is creating chaos and further investment uncertainty at a time when we need clear, science-based climate and energy policies.

Again, we reiterate, this power station would likely become a major, publicly-funded customer for the gas fracked by Santos at its proposed Narrabri coal seam gas project.

This gas would likely be transported south via the proposed Hunter Gas Pipeline - which may also be publicly subsidised.

Santos Ltd is a major oil and gas corporation and one of the biggest donors to political parties in Australia. This is unacceptable! Freedom of Information documents show Santos asked the government to subsidise the Hunter Gas Pipeline, which later confirmed it was in talks with the government about getting subsidies.

These projects are all calling for the Government to subsidise them with public money, and are [all linked to large political donations](#):

The owner of the proposed site for Kurri Kurri power station described himself, in an Independent Commission Against Corruption (ICAC) hearing, as a “walking ATM” for political donations, and was found by ICAC to have made illegal donations.

The lead proponent of the Hunter Gas Pipeline project has also been a major donor to the Liberal Party.

Gas is a polluting fossil fuel that harms our waterways, land and air. Polluting unconventional gas fields are opposed by many frontline Aboriginal communities as a risk to land and water, disrupt rural communities, industrialise farmland, threaten water sources, and carve out huge amounts of land for well pads, pipelines, and new access roads.

Mining and burning gas is fueling climate change, harming health, driving disasters and damaging the economy. Multinational gas companies have been ripping us off for years. They pay little or no tax from exporting overseas most of the gas they mine in Australia while we're left paying high prices for our own gas. All in all, once again, this proposal is unacceptable on all levels.

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is positioned above the typed name.

Jan Davis
President Hunter Environment Lobby Inc.