

I am writing this submission opposing AGL's proposed extension of time for the commencement of work on the Dalton Power Plant.

I oppose this proposal for a number of reasons as outlined below.

My Concerns

I purchased a 10-hectare block on the side of Gunning to build my dream off grid sustainable home, a dream of mine since I was young. I have built the shed and installed my Solar power with Lithium battery storage without grid connection. I am just about to sign contract with the Bank and Builder.

My first concern is around my properties value. I strongly believe that the construction and operation of this power plant will have a significant negative effect on the value of my land and final build price. With a 2-year extension, would add a significant level of uncertainty in to the property market in the area. One of the main reasons I purchased in Gunning was the "small town feeling", having a large gas fired power plant close by would detract from this, hence devaluing the property.

Next there are the obvious health concerns to myself and my children from the particulate matter being burnt and with the prevailing winds blowing from Dalton to Gunning it is a major concern.

Particulate matter falling in the property and ending up in my drink water can pose a health risk, I also live next to Gunning drinking water treatment plant (a 10 million dollar build) that has a large open air holding pond for the drinking water for gunning that is also likely to collect the by-products of the burnt fuel from the power plant.

I, as the majority of the world, believe that burning of fossil fuels and carbon producing fuels is creating great damage to our planet. With global temperatures breaking records year after year the world and Australia needs to take action to reduce and reverse these effects. The construction and running of a gas fired power plant such as the one proposed by AGL is not in my opinion the correct or moral choice. AGL has the opportunity to act as a responsible global leader and abandon their plans for the gas fired plant.

I do not feel that AGL represents our community's ideals and values, either by their lack of consultation, which shows a blatant disregard of our community at best, or their prosecution for undisclosed political donations. They are not a fit for our community.

I would now like to address AGL's justifications in their submission.

Importance of the Project – change in market conditions

The original justification was "that it will contribute to ensuring adequate, reliable and consistent supply of electricity during times of peak demand in NSW, and help to keep downward pressure on price." I would argue that the use of gas fired power plant will not keep downward pressure on cost, considering recently our Prime Minister had to take Gas producers to task about not supplying domestic gas as they were making higher profits exporting. As for adequate, Reliable and consistent, yes Gas fired plants can offer this as can pumped hydro (such as the recently announced Snow Hydro II project) as well as solar, wind with grid level storage. We have seen recently Elon Musk offer assistance in SA with Grid connected storage, which publicised several other (Australian) consortiums that were in the process of providing other solutions in this area.

AGL also points out

“Furthermore, the potential for a regional blackout (similar to the recent blackouts in South Australia) increase as NSW becomes more reliant on wind and rooftop PV generation. This risk is heightened at times when high demand coincides with low wind and rooftop PV generation and unplanned generation outages.”

While demand planning is a very important part of the energy market the issues in SA were in the first instance, I believe, due to failed transmission infrastructure, not generation issues and in the more recent case due to the Pelican Point power station not being turned on.

Improved efficiency, flexibility and greater community consultation

AGL would like to review and “update” the DPP, and while applaud the use of new technology, I do not believe it is appropriate for AGL to assess it under this proposal. My understanding is that any modification would be assessed under the rules at the time of approval. These have now been changed, I also believe that the environmental impact statement should also be redone, under the new planning and environmental protection laws.

I also note that AGL speak to the use of Battery storage technology, and while I do applaud them for its consideration I think their mix of technology is flawed taking into account the changing market, community attitudes to renewables and I urge AGL to consider solar and battery storage as a viable alternative.

AGL then goes on to speak to the ongoing uncertainty for the local community. They speak to “recommencing engagement” with the local community, council etc.

AGL states

“In the 7-8 years since the initial development activities at Dalton; AGL's approach to community consultation has improved in effectiveness and sophistication. This improvement has been built on experience across Australia in wind, solar and CSG projects. Today, AGL has a dedicated and well-resourced stakeholder team which are a key part of our development activities. This team not only assists in consulting with the communities in which we operate but also in auditing and ensuring that our projects meet our board endorsed sustainability standards. At the heart of these standards is the routine use of Community Consultative Committees during development and construction to ensure effective communication. During a MOD2 process; setting up a CCC would be our first action in preparing an application to update the DPP approval.”

I have received no engagement from AGL and was only made aware of the proposal via the Gunning Community Facebook page. I also attended a community meeting in Dalton on the 23/3/2017 where no one who attended had received any notification or engagement from AGL. In fact one of the members of the original community group that opposed the development in 2012 only found out when he was contacted for comment by the Goulburn newspaper.

This does not signify to me that AGL has any attention to engage meaningfully or in good faith with the local community.

They continue on saying that

“Initial engagement activities will focus on understanding key issues of concern and rebuilding relationships in the community. These activities will include meetings and briefings with State and

Federal Members of Parliament (MPs), Council, and members of the community who have previously shown an interest in the project.”

Again, I direct you to the fact that the local community only found out about the AGL seeking an extension via the local newspaper, which generated posts on the community Facebook page by locals.

AGL also states that

“AGL's approach to engaging with the community is outlined in our Community Engagement Policy. We seek to:

- Be a trusted and respected member of the communities in which we operate*
- Engage beyond baseline regulatory requirements.”*

On the first point, I am under the understanding that your Department prosecuted AGL for failing to declare political donations relating to previous application including the original one for the Dalton power station. This I believe leave AGL are neither Trusted or respected in the Local community.

I have already addressed the second point in significant detail.

Increased private sector investment consistent with government policy

While I have no disagreement in principle on the statement of private sector investment, as stated under the “Importance of the Project - change in market conditions” section I do not see how gas will put downward pressure on prices with the high cost of gas being exported. Also Extending the lapse date does not make the project any more viable than not extending it, and resubmitting under the current Development regulation instead of under part3a.

Socio-economic benefits

AGL does not provide any reasoning as to why the extension of time would provide any benefit and in fact state that *“Extending the lapse date would not change the positive socio-economic benefits of the DPP”*

As to their assertion that the DPP would require 250 jobs during construction and that they would try to seek these locally I think that this type of construction is somewhat specialised and unlikely to be found within our local community, other than perhaps some fencing contactors or landscapers.

No change to scope as a result of extending the lapse date

While I do understand that MOD1 would not change the scope of the DPP, if AGL do intend to as they have stated

“The extended lapse date would enable a full review of the DPP, and if required, a more substantive modification which would include specialist studies of any modifications to the project scope”

Then an extension should not be issued and if AGL wishes to continue they should lodge a new proposal.

Changes to the surrounding environment

While the extension itself would not result in environmental impacts, AGL states that a MOD2 could be lodged, again the extension should not be granted and AGL should, if they wish to proceed, lodge a new proposal.

Conclusion

As outlined above I urge you to NOT grant the extension of time for commencement of the Dalton Power Plant.