

## **The looming renewables disaster in NSW.**

As I write, there are four solar renewables SSDs currently on exhibition: Limondale, Beryl, Gilgandra and Bailey Park. This submission will be lodged with each.

Additionally, of the solar State Significant Developments in NSW, by my rough calculations, one is in the pre-SEARs phase, 3 more have been issued SEARs and 1 has submitted an EIS. For 3 more the proponent is reviewing submissions and 10 more have been approved, some constructed.

There appears to be a stampede in NSW to get solar projects approved. Developers must know something. They have signaled more to come. I have no access to the backlog in other states where the sun also shines, but if NSW seems to be favoured, then the Department should ask why.

The lead time in NSW between the request for SEARs and Determination could be as little as six months as the departmental staff gains expertise at evaluating these projects in isolation. A solar farm DA would appear to be the easiest SSD to get through the planning process.

The last approved NSW solar farm, Goonumbla was approved less than 7 months after the issuance of SEARs. Interestingly, the Recommendation was completed and signed less than 3 weeks after the end of the exhibition period. David Kitto, on behalf of the Minister approved the project on the same day he received the Recommendation, indicating to me that Mr Kitto did not question the implications of what he signed, preferring to trust those below him.

Those implications are severe.

Following the renewables fiasco in South Australia late last year and the closure of Victoria's Hazelwood power station, it should be clear to everyone that NSW and Victoria are closely following South Australia towards a dark energy future, with major blackouts predicted as early as the coming summer.

Those blackouts will be entirely due to the unpredictability and variability of existing wind and solar renewable projects and the negative impact they have had and will continue to have on cheap and reliable coal fired base load as indicated by the closure of Hazelwood and others.

Should these predictions come true, the NSW Government will be looking to apportion all of the blame, as did the South Australian Government. Some will be directed at the Federal Government, who in response will hide behind the invalid sovereign risk argument. For NSW wind farms the Planning Assessment Commission will be a perfect scapegoat, as they continue to openly state that they are responsible for the approval to date of all recent NSW wind farms. The Department, in recommending all wind farms be approved, will take some blame, as they should, but will be somewhat sheltered, unfortunately. The PAC is aware of the impending issue but it is unclear whether they will react.

For solar farms, as none of these solar projects will likely be decided by the PAC, having failed to attract 25 objections, all responsibility for their contribution to grid instability will rest with the Department, specifically one or two managers, and ultimately the Secretary. The Planning Minister and the Premier should be able to refer to some directive that points the finger at departmental management.

This assembly line of solar farm approvals is probably being currently used as a case study within the Department as to how SSD projects can be easily progressed. After all, if the SEARs can be produced in a few days, assessment completed in a week or two and approval obtained in hours, why wouldn't you be proud of the process. The fact that the broader process is potentially leading to disaster appears to be escaping the departmental management.

The PAC process allows for experienced Commissioners to evaluate the issues, with outside assistance if required, and also for communities like ours, with ever developing expertise, to provide input. All wind farms, and many modifications will be decided by the PAC.

The Department is gladly taking all responsibility for solar Determinations.

In reality, this means the assigned planner, as those with the delegated authority to approve on behalf of the Minister are swamped with difficult projects: wind, coal and gas. A solar Determination for management must look like a walk in the solar park, so to speak. Practically, you can't expect the planners to have the skills or expertise to even understand the full details of the issue.

I would venture that no-one in the Department has those skills and that expertise required to evaluate the impacts of these multiple solar farms on the stability of the grid (on top of the wind backlog).

I see no evidence that anyone has been assigned this responsibility or that anyone with the required knowledge has been hired.

I see no evidence that they are soliciting outside expertise to advise on this ominous problem, or even if they recognize its looming approach.

Plainly, the assessment of grid instability due to solar projects is a departmental responsibility, given it is a predictable impact from each project. No blame can be assigned to the developers if they choose not to address it as an impact as required by the SEARs if the Department lets them get away with it.

In a market based environment, many of these solar farms would not be built, let alone proposed. But this is not a market environment. This market is driven by Renewable Energy Certificates. Solar farms are just another industrial factory producing REC widgets. They have a legislated market advantage, a guaranteed price, far in excess of their worth, and a guaranteed buyer with their financial arms twisted up their backs. When developers come across a welcoming body such as the NSW Department of Planning, with a culture of approval, they can't be blamed for seizing the opportunity. It is up to the Department to look after the interests of the people of NSW, a responsibility that they have failed in nearly every renewable instance.

Clearly, SEARs for solar farms need to specifically address these potential impacts. All outstanding SEARs need to be modified, as is the prerogative of the Department.

All EISs need to be revised with this impact addressed.

There is truly independent expertise out there in both the private and public sector. On an issue such as this with its ability for reputational damage, these independent experts are unlikely to give the marshmallow opinions we have come to expect from their wind farm equivalents hired by the Department.

To summarise the above in terms everyone understands, departmental management needs to protect their backsides. In doing so they will protect their political masters and those of us who elect them or throw them out.

On past performance, the Department will probably ignore the advice in this submission. Most times I prefer it that way. They can never, however, claim they were unaware of the issue.

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