

Bango Wind Farm Strategically Damaging Proposal for NSW

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ABSTRACT

There is no economic case for building Bango wind farm, which would be strategically damaging to NSW. The proposed wind farm threatens electricity security and prices for the people of NSW and would increase the likelihood of future blackouts.

The EIS does not comply with the requirements of the DGRS for the proposal nor with the requirements of Schedule 2, Part 3, s 7(1)(c) of the *Environmental Planning and Assessment Regulation 2000*.

The proposal should be summarily rejected as contrary to the economic and security interests of NSW, its citizens and its industry.

There is no economic case for building Bango wind farm. It is harmful to the local area and, were it ever built, would be harmful to NSW and would impose increasing costs on power consumers in NSW.

There are multiple reasons why it is strategically damaging to NSW and none of them are discussed in the alleged EIS:

- There are already more than enough wind farms in the national pipeline.
- The US, under President-elect Trump, has just turned away from “renewable energy” and back to fossil fuels changing the global competitive environment to pursue cheap, reliable energy – countries that do not will see their economies and employment weaken further.
- Bango wind farm would be a threat to the NSW electricity network and increase the likelihood of future blackouts, particularly given the proposed location.

Oversupplied wind farm pipeline

The National Wind Farm Commissioner has said the amount of “renewable energy” projects in the pipeline is something like three times what is necessary to meet the RET. There is thus no need for Bango wind farm. Hopefully DPE has the data but let me know if you don’t.

It is clear from AEMO that meeting any future electricity generation shortfall depends on baseload, available on-demand, capacity and that wind energy inherently cannot provide such power. Consequently this proposal is, at best, an indulgence at the expense of electricity consumers rather than a real contribution to providing reliable power.

Any wind farm capacity has to be fully backed up by on-demand facilities, either baseload capacity or gas-fired turbines – since no one including the Minister is prepared to have their lights go out when the wind is either not blowing or blowing too fast. This means paying for duplicated capacity and the cost falls on NSW electricity consumers. It is the responsibility of the NSW Government to ensure cheap, reliable power to its citizens and industry, not to dramatically increase their costs and reduce energy security for the purpose of lining the pockets of developers.

Collaboration of the DPE and Minister Stokes in forcing up NSW electricity process through proposals such as Bango will produce more pain for the people of NSW and more electoral losses for the government.

Dramatic change in the global competitive environment

The US has just elected a Republican President, supported by Republican control of both houses of Congress, who is committed to massively boosting US extraction and consumption of fossil fuels – which destroys the future of “renewable energy” in the US and then globally.

It also means that soon the US will join China and India in producing increased volumes of CO₂. That means all countries reducing the use of fossil fuels will become less economically competitive globally and the comparative living standards of their citizens will decline.

It is the responsibility of the Government of NSW to recognise this change and start to protect its people. Neither NSW nor Australia can “save the planet” when the US, China, India and most of the world are unrestrained in their emissions of CO₂.

President-elect Trump's position can no longer be treated as campaign rhetoric. The transition site established, since his election, for actions and policies to now be implemented contains the statement:

“Rather than continuing the current path to undermine and block America's fossil fuel producers, the Trump Administration will encourage the production of these resources by opening onshore and offshore leasing on federal lands and waters. We will streamline the permitting process for all energy projects, including the billions of dollars in projects held up by President Obama, and rescind the job-destroying executive actions under his Administration. We will end the war on coal, and rescind the coal mining lease moratorium, the excessive Interior Department stream rule, and conduct a top-down review of all anti-coal regulations issued by the Obama Administration. We will eliminate the highly invasive "Waters of the US" rule, and scrap the \$5 trillion dollar Obama-Clinton Climate Action Plan and the Clean Power Plan and prevent these unilateral plans from increasing monthly electric bills by double-digits without any measurable effect on Earth's climate.”¹

Note the statement not just to unleash coal and oil but the intention to “scrap the \$5 trillion dollar Obama-Clinton Climate Action Plan and the Clean Power Plan” and the statement they have no “measurable effect on Earth's climate”.

The Paris Accord was propped up by President Obama agreeing that China and India could burn all the fossil fuel they wanted while the US would reduce its CO2 emissions. That “agreement” was never a US Treaty since Obama did not take it to the US Senate for ratification (he knew it would not pass), something constitutionally necessary for a US Treaty. Consequently it is simply an agreement between Barack Obama and any countries dumb enough to sign it and legally can be repudiated by another President any time he wishes. President Trump has made clear he will do so soon after taking office on January 20, 2017.

Threat to electricity security for NSW

The recent state wide blackout in South Australia has shown the dire consequences of becoming heavily dependent on wind power, especially when the generation facilities are concentrated in a small geographic area. The Eastern power grid is about to become more at risk with the closure of Hazelwood power station. Since NSW is tied into the single grid, reduction in base-load capacity threatens NSW as well as other Eastern Grid states.

Geographic concentration of wind farms in NSW (as in Victoria) is currently even worse than in South Australia. That makes NSW wind power generation highly vulnerable to localised weather conditions (whether calms or storms) that can simultaneously eliminate most of the output, throwing demand onto ever diminishing base-load power stations.

If NSW is to build more wind farms, they need to be widely dispersed around the state to greatly reduce the possibility of highly correlated wind farm power outputs and losses. Approving and building Bango, in the area where most NSW wind farms are concentrated²,

¹ <https://www.greatagain.gov/policy/energy-independence.html>

² Complete: Cullerin, Gunning, Gullen Range, Crookwell 1, Capital 1 and Woodlawn; Approved: Capital 2, Crookwell 2, Yass Valley, Conroy's Gap; Being assessed: Rye Park, Biala and Crookwell 3.

would be a deliberate act of vandalism directed against the NSW power system with ultimate harm to all NSW power users.

The NSW Government should not approve another wind farm until there has been an exhaustive review of the full implications for electricity security for the people and industry of NSW. It should not consider any wind farm proposal which does not carefully examine how its inclusion in the NSW power system will, over time, affect the retention of critical baseload power stations, the stability of the grid, and power costs to consumers when taking account of the necessary backup capacity, the additional transmission infrastructure, and RECS.

The EIS fails to analyse the threat to NSW electricity security or the impact of this wind farm on electricity prices. Thus it does not comply with the DGRS.

The EIS also fails to comply with the requirement of Schedule 2, Part 3, s 7(1)(c) of the *Environmental Planning and Assessment Regulation 2000* to provide:

an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure

There are certainly many other locations in NSW which are geographically far from the Southern Tablelands wind farm concentration and where the developer could have considered alternatives which would lower the electricity supply risk from increased concentration. The developer has not done that so as to make any case, let alone a strong one, for building the wind farm in the proposed location.

The proposal therefore does not comply with either the DGRS for the project or the Regulations, as well as being a threat to electricity security and costs for the people of NSW.

This proposal for Bango should be eliminated now instead of haunting the area for years and lingering as a threat to the security of NSW power supply.