

mt/ph

20 March 2014

Mr Neville Osborne  
Department Planning & Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Osborne

**Subject: Exhibition of Modification Request for Wellington Gas Fired Power Station (MP 06\_0315 MOD 2)**

Thank you for the time extension for Wellington Council to make a submission on ERM Power's request to modify the above project. I note the submission should advise on recommended conditions of approval.

I note the modifications ERM Power has requested relate to:

- An extension of the lapse date to March 2019; and
- Changes to the power station gas turbine configuration to use two 4000F gas turbines.

ERM Power make the case that the extension will give them time they need to fit with the Australian Energy Market Operator's forecasts for a shortage of power generation. ERM Power also notes their peaking power capacity will be needed at least 2 years ahead of the need for increased base load generation. Consequently the latest construction start date of 2019 would allow for commercial operation in of the Wellington Gas Fired Power Station in 2021, when a shortage of power generation is forecast.

Council is supportive of the ERM Power request for an extension until March 2019.

On the second modification regarding gas turbine configuration, I note ERM Power's request to settle 2 4000F gas fired turbines. On 7 September 2010, the Project Approval was modified to allow for greater flexibility in the selection of gas turbines and provided for the establishment of an alternative station layout comprised of either 4 x 150MW or 2 x 225MW gas-fired turbines. The approval also introduced a new clause 1.1 which stated the following:

1.1 The proponent shall carry out the project generally in accordance with the:

- a) Major Project Application 06\_0315;
- b) Wellington Gas-fired Peaking Power Station: Environmental Assessment prepared by Parsons Brinkerhoff Australia Pty Ltd and dated May 2008;

- c) Wellington Gas-fired Peaking Power Station: Environmental Assessment – Submissions Report prepared by Parsons Brinkerhoff Australia and dated September 2008;
- d) Prepared by ERM Power dated March 2010, including the following supporting documents:-
  - Wellington Power Station – Noise assessment of Siemens 4000F units prepared by Parsons Brinkerhoff Australia Pty Ltd and dated March 2010 and Wellington Power Project Proposed Modification Submissions report dated 1 June 2010; and
- e) The conditions of this approval.

I have read the summary of the report by Parsons Brinkerhoff Australia Pty Ltd provided in the Memo by Aaron McKenzie on 20 December 2013 and have reviewed the additional information regarding noise. I note the proposed use of two 4000F gas turbines is within the Project Approval modification made on 7 September 2010. I understand this approval observed the modification around gas fired capacity allowed the station to operate as an intermediate as well as peaking plant with a modified annual capacity factor of 40%.

After considering the additional advice from Aaron McKenzie, on balance, I believe the mitigation requirements relating to noise at paragraphs 2.9 and 2.10 set out in the 4 March 2009 approval File Number S06/01062 should be retained. ERM Power should identify noise abatement strategies as per paragraph 2.9 to reduce the noise impact on occupants of Nanima House. I believe this is appropriate given that proposed noise levels according to the Parsons Brinkerhoff report are likely to occur outside the approved limits for that location.

Council is supportive of the ERM Power request to use 2 x 4000F gas fired turbines subject to conditions being met requiring noise abatement strategies to reduce the impact on the occupants of Nanima House.

I appreciate the opportunity to make a submission on the ERM Power modification request. I look forward to receiving advice of same in due course.

Yours faithfully



Michael Tolhurst  
**General Manager**

20 March 2014

Cc Diane Sarkies