



Ms Mandana Mazaheri
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Dear Ms Mazaheri

Environmental Impact Statement for Jemena's Western Sydney Green Gas Project

Thank you for the notification to the Energy Networks team of Jemena's Western Sydney Green Gas Project Environmental Impact Statement (EIS) being on public exhibition. I understand the Energy Networks team has been working with Jemena and the Planning and Assessments team as this project progresses through the planning assessment process.

After reviewing the EIS the Energy Networks team, as safety and technical regulator of gas networks, is seeking clarification on the scope and future processes for this project.

Following the initial scoping meetings it was our understanding that the project was proposed to be a trial with a maximum five-year life. Section 2.3 of the EIS indicates that the project has a minimum five-year life while section 3.5.4 on decommissioning states "*Upon completion of the WSGG Project, a decision will be made by Jemena for continued operations or to decommission the WSGG Project facility.*" The Energy Networks team will coordinate with Jemena to ensure appropriate safety and technical regulation of the project over the longer period if this is the intent.

The Energy Networks team is seeking confirmation of this change and to understand that the conditions of consent will have a milestone/approval point for the decision on whether the project will be extended beyond five years.

Following on scoping discussions for this project we understand that the intent is that the project will be included in Jemena's existing Safety and Operating Plan (SAOP) which is regulated under the *Gas Supply Act 1996*. The EIS does not clearly indicate to us how much of the project will be within the SAOP.

The Energy Networks team is seeking a clear understanding of which aspects of the project (just the hydrogen electrolyser and the hydrogen storage system with relevant safety shut off systems or the entire project including the possible refilling station and power generator) Jemena intends to include within the SAOP to be regulated.

We note also that the EIS indicates that the project has a provision to double the hydrogen making capability (from 100m³/hr to 200m³/hr). If this facility falls within the scope of the SAOP, the Energy Networks team will require notification and consultation before an increase of the capability occurs.

The Energy Networks team is seeking to ensure the conditions of consent address this requirement.

The EIS does not appear to examine the impacts that this project may have on customer installations and appliances. The Energy Networks team has been in communication with NSW Fair Trading as the administrator of the technical safety for customer installations. Given the likely implications for customers downstream, it would be appropriate to place requirements on Jemena through the SAOP to address these implications. These requirements will be dependent on the duration of the project, delivery capabilities and network delivery aspects.

We acknowledge that this trial project, along with other similar hydrogen projects within Australia, will continue to develop as the construction, operation and maintenance of projects is undertaken and information sharing within the industry occurs.

The Energy Networks team is further seeking to ensure that Jemena is aware that commencement for works is conditional on the receipt of planning consent for this project. Additionally, any conditions of consent should include a requirement that works can only commence following the SAOP having been updated and provided to the Secretary, with time for consideration.

The Energy Networks team will inform Jemena directly of the expectations for the SAOP to ensure the technical safety of the project and the manner in which this will be monitored within the network.

If you have questions relating to these issues please contact Warren Woodhouse, Senior Technical Advisor 8275 1932 or email warren.woodhouse@planning.nsw.gov.au. The Energy Networks team is also available to meet to discuss these items if required.

Yours sincerely



Cameron O'Reilly
A/Executive Director
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