

Comments on Hay Sun Farm, Modification 2.

Why is the cynic in me questioning whether the reasons justifying this Modification are genuine and complete? As offered:

- manage electricity output to meet demand
- improve the reliability of electricity output
- provide frequency control and ancillary services to the electricity network.

Others have been more expansive, admitting that BES will provide an additional source of revenue. Still others admit the benefits of being able to charge from the grid after the sun has set.

The altruistic reasons given above somehow don't justify the expenditure of tens of millions of dollars. Would I have expected to see some comment on consultation with the grid operator about the modification and its impacts and location? Probably.

Why is the cynic in me thinking that information is being withheld from the public?

In the concurrent submission of Modification 1, in addition to the EIS, there is:

- a covering letter (published)
- an Application (published)
- a political donations statement (unpublished). In the Application, the applicant states that it has made a contribution(s) in the past two years.
- Other relevant unpublished documents

Supporting this Modification 2, only the EIS exists.

The cynic in me is surprised that only BES systems of 30 MW and above require a Preliminary Hazard Analysis. Only this week, television aired a whole program where a 747 was bought down by fire caused by much smaller lithium batteries. How can you make the statement that there will be no additional environmental impacts if you haven't done a Hazard Analysis on a project Mod with known hazards.

The cynic in me is not surprised that the developer has chosen, after DPE input, a battery size of a maximum of 29MW.

However, I can't grasp why 30 containers requires an area 50% greater than the MCG and proportionally way out of scale with the much larger Hornsdale "big battery". Nor can I grasp how this will cause no "additional surface disturbance" as mentioned in a number of places.

The cynic in me is also not surprised that DPE, according to the developer, has classed this Modification as minor. We have seen before the department predicting the outcome of an Application before the merit assessment.

In the section on heavy vehicle movements, the applicant clearly implies that the BES will be constructed concurrently with the solar farm. Somehow, I don't believe the commitment is there and will not be until the State or Federal Government, in desperation, announces a BES subsidy.

In the letter to the Council, the developer writes: "The batteries, if installed..."

I smiled as I read the comment on decommissioning the batteries, with the implication that the batteries will last as long as the projected life of the solar farm.

And finally, the cynic in me will be waiting for the Assessment, undoubtedly positive, that restricts the BES to 29MW max, that insists that the BES with the security and reliability benefits it purports to bring, ala Finkel, must be completed in parallel with the solar farm, that states the battery can only be constructed in the location specified and that thoroughly reviews the claim that there are no additional environmental impacts.