

Submission on the Hunter Power Project (Kurri Kurri Power Station)

Having read the Environmental Impact Statement published by NSW Projects for this project I submit that there are substantial deficiencies with it, and a number of reasons why this project should not proceed. In short, it is unnecessary economically, and disastrous in its contribution to climate change and the way in which it diverts resources away from the movement towards low emissions forms of electricity generation.

1. On p.vi the EIS states *"The Australian Energy Market Operator (AEMO) has advised the Australian Government that with the closure of Liddell Power Station in 2023, there will be a gap in dispatchable capacity that will need to be filled through the addition of firming capacity. The Proposal's primary aim is to substantially contribute to meeting this need."*

However, this is disingenuous since it fails to mention that AEMO has predicted a shortfall of only 154MW. AEMO already stated in 2018 that AGL's plans for substitute dispatchable power were adequate to cover the shortfall, and subsequently that the NSW Government's Emerging Energy Program already contained commitments to produce more than this figure.

2. P.vii notes (and s.23.1.4's two brief paragraphs on the economic benefits fails to elucidate as an *"evaluation"*) that the Kurri Kurri project will produce only *"about 10 permanent full time equivalent jobs on site during operation"*. Ernst and Young in a report released in 2020 found that \$1 million invested in renewable energy and exports creates 4.8 permanent jobs while the same in renewable energy infrastructure creates 4.95 jobs. The outcome of only 10 jobs at Kurri Kurri for such a huge project cost is an economically unjustifiable contribution to regional employment and does not contribute towards justifying this project. Indeed, it is dishonest to claim this figure as a measure of success by not putting it in comparative context.
3. P.viii - ix states that (obviously) the combustion of gas and diesel fuel when the plant is operational *"would generate air pollutant emissions...[such as] carbon monoxide, carbon dioxide (CO₂), nitrogen oxides, sulphur oxides, suspended particulate matter (such as PM₁₀ and PM_{2.5}), and unburnt hydrocarbons"*. This process would release an estimated *"500,299 tonnes of CO₂"*. The EIS is deficient by failing to include or quantify the risks to further climate change from this project, the estimate of greenhouse gas emissions seemingly fails to include any amount for fugitive emissions from methane leaking from gas wells or in transmission, and does not explain the effect of this project on NSW's commitment to net zero greenhouse emissions by 2050. The EIS, on the basis of these omissions alone, is incomplete and inadequate.
4. The Justification on p.x and comment on firming technologies on p.53 makes a series of questionable statements based on untested assumptions. Particularly, the claims made that batteries are an inadequate solution to firming intermittent renewable energy supply is not evaluated in the EIS. For example, the South Australian Tesla battery of 100MW/hours (subsequently increased to 150) for example cost \$90 million. Since the Kurri Kurri power station is only a peaking plant used for up to 2% of the time, this EIS should quantify the estimated period it is in use set against the capacity of battery storage to provide backup during this same time. Another example is the NSW Government's Emerging Energy

Program which details five capital projects already granted funding based on battery technology totalling 220MW. The claims of firming insufficiency by batteries should be rigorously tested by this report to demonstrate the economic and energy supply credentials of the Kurri Kurri project. Not to do so impugns the integrity of the report and invalidates its conclusions recommending the Kurri Kurri power station be built.

In short, this EIS fails to reasonably satisfy Australian and NSW taxpayers that this project is necessary, cost effective or is positive in its contribution to Australia's goal of mitigating global heating.

This EIS should be rejected and the project halted until the Federal and NSW Governments' case for it is transparently and unambiguously presented.

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