

## **SUBMISSION - HUNTER POWER PLANT EIS**

This submission is in response to the Hunter Power Plant EIS which is open to public comments to 9 June 2021.

The EIS provides a justification for the project that does not stack up. It argues that the project is required to substantially fill a forecast 215 MW gap in capacity in summer 2023-2024; a gap which in actual fact was revised to 154 MW and analysts say has already been addressed by under-construction and committed projects.

The argument is bonkers. According to the Australian Energy Market Operator (AEMO), this ‘gap’—which is not a gap in day-to-day generation, but related to a highly conservative measure of “spare capacity”—is a risk specific to between 1 January 2024 and 29 February 2024 *on weekdays between 3pm and 8pm*. But apparently we need a \$600 million, taxpayer funded, 750 MW gas generator to plug it. With a lack of well-supported reasoning, the EIS does not consider batteries to be a sufficient alternative.

In the longer term, the EIS argues that the project will contribute ‘substantially’ to the 1,480 MW additional generation capacity NSW will need by 2030. Apparently it will do this by operating about 2 weeks per year – like Snowy Hydro’s other gas plant that rarely turns on. That is, of course, unless the electricity spot market price is sky high.

The EIS argues that the project will help keep NSW electricity prices low – but completely ignores gas price – and the fact that cheap gas (like the sustained \$4-\$6/GJ AEMO says is required to keep open cycle gas turbine plants competitive with batteries) is all but implausible. Not even the approved-at-any-environmental-cost Narrabri Gas Project is expected to deliver gas at that price. Oh well, lucky Kurri Kurri will still run on diesel.

The EIS talks to plant ‘reliability’ – ignoring how often gas power plants break down.

Of course, no gas power station EIS would be complete without trotting out how gas *helps* support decarbonisation by providing firming of intermittent renewables. Battery capacity considered, it’s true gas peaking probably does have firming advantages *in some climates*, like during a week-long blizzard, say in Texas. (Oh, then again...) But in Australia? AEMO’s most ambitious scenario for the future of the National Electricity Market not only sees coal power retire by 2040, but about half of Australia’s gas power stations as well. Are new gas power stations essential then? No.

Climate denialism has morphed into climate inactivism and this project is an example. It will add greenhouse gas emissions to the inventory that don’t need to be added, and which fail to support NSW and Australian greenhouse gas reduction commitments and targets. The Hunter Power Project rides roughshod over good advice and good analysis. It should be refused.