

Carly Phillips

Submission on the proposed Hunter Power Project (Kurri Kurri Power Station). Application number SSI-12590060

I strongly oppose this project and call on the Minister to reject the project.

I am a primary school teacher at a local primary school here in the Hunter and am currently on maternity leave. I have many concerns about the project and have done my best to write them as concisely as possible.

Long Term Investment:

There is already a huge call from the community here in the Hunter to create long-term sustainable jobs in manufacturing and renewables. At its peak the project will only create 250 jobs during construction and only 10 permanent jobs. The Hunter Jobs Alliance has called on the State and Federal Governments to create a clear plan for the Hunter post fossil fuels.

<https://www.hunterjobsalliance.org.au/publications>

Reports such as The Million Jobs Plan

https://bze.org.au/research_release/million-jobs-plan/ show that there are many options outside of fossil fuel projects that can be executed here in the Hunter. The Hunter needs a clear plan for the future, not short term jobs.

Inadequate Consultation:

28 days did not allow the public adequate time to organise their submissions. Myself and others have called and emailed the Minister for Planning aPublic Spaces to ask for additional consultation time. Myself and others, attended Rob Stokes' office on 4/6 and one of his staffers also said that he would inform the minister that there was a call from the community to extend the submission process beyond the initial 28 days.

Waste of Public Money:

As a teacher, who is married to a GP, I would like to see more funding for health and education as I have seen first hand the deprivation, poverty and trauma that many families have as a daily struggle. \$600M could provide

more school counselors, more intervention support in schools and more funding for school sport and STEM projects that will inspire students to be more engaged in their schooling.

\$600M is a huge amount of public money to be spent on a power station that may only be used 2% of the time. There is already a gas fired power station in Colongra that was only used 0.4% of the time last year. If we already have a gas fired power station that is not being used much, then why do we need another one? Predictions from experts are that the gas fired power plant will actually end up costing significantly more money. With a capital cost of \$610 million ("likely to cost 30-50% more" – Tom Parry, AFR, 24 May '21)

Critical Infrastructure Status:

How is this project already declared as 'critical infrastructure' and then being put through a submission process? I argue that this is NOT a critical piece of infrastructure as the gaps in the grid that are created from the closure of Lidell can be filled by renewables.

Many industry experts believe the project is unnecessary / will not reduce costs:

Australian energy board chair says gas-fired power plant in Hunter Valley 'doesn't stack up'

"Nobody is going to build it from the private sector because it doesn't stack up. Because it's expensive power, it's hard to see it makes commercial sense." Kerry Schott, Chair, Australian Energy Security Board

<https://www.theguardian.com/environment/2021/apr/30/australian-energy-board-chair-says-gas-fired-power-plant-in-hunter-valley-doesnt-stack-up>

"Using gas to create electricity is a really expensive way to do it.

If you're interested in driving down electricity prices, then you'd be mad to use gas." Matt Kean, NSW Energy & Environment Minister

<https://www.abc.net.au/news/2021-04-12/four-corners-gas-plan-pressured-experts/100055730>

‘We’re burying banknotes’: Ross Garnaut rubbishes government’s \$600m gas plant’

“the gap in the market will only be 150 megawatts and have questioned the ability of a new gas power plant to reduce power bills”

<https://www.smh.com.au/politics/federal/we-re-burying-banknotes-ross-garnaut-rubbishes-government-s-600m-gas-plant-20210525-p57usa.html>

The Project is not needed:

There are existing market mechanisms to prevent grid reliability issues

The recent report by the Victoria Energy Policy Centre states that the proposed Kurri Kurri Power Station (KKPS) is simply not needed. The Australian Energy Market Operator forecasts no shortfall of dispatchable power generation in NSW. But KKPS will have a limited supply of gas and its back-up diesel will be prohibitively expensive (and polluting). KKPS, like nearby gas fired power plant, Colongra, is unlikely to be capable of running (at capacity) on gas for more than about five hours at a time. It will then take a day or so for its gas supply to recharge. This is not the innovative new technology that we need to provide power to NSW homes and businesses.

Mountain, B.R., Percy, S., Woodley, T. 2021. “Kurri Kurri Power Station: charging tax payers for hot air”. Victoria Energy Policy Centre, Victoria University, Melbourne, Australia

Several large batteries have been announced since the government threatened the market over Liddell closure.

Shell and Edify in landmark big battery storage deal in NSW

“This battery will help to keep the lights on and keep costs down during peak energy periods, and support more renewable energy to come online,” Kean said. The statement also noted its role in helping replace the capacity lost through the closure of the Liddell coal generator in 2023.”

The Riverina battery, due to come online in 2023, is one of more than a

dozen big battery projects currently being built or proposed in NSW, the country's biggest state grid.

<https://reneweconomy.com.au/shell-and-edify-in-landmark-big-battery-storage-deal-in-nsw/>

Existing gas generators have relatively low utilisation:

“Australia's gas-fired power output plunged to a 16-year low in the March quarter because of rising natural gas prices, lower power demand and competition from renewable energy”

<https://www.nasdaq.com/articles/australias-natural-gas-fired-power-output-slumps-to-16-year-low-2021-04-27>

Climate Change - Moral obligation

Sharma v Minister for Environment (May 29, 2021) established a new duty of care to protect young people from foreseeable future climate change harms and establishes a clear link between fossil fuel projects and those harms.

“If we want to reach net zero by 2050 we do not need any more investments in new oil, gas and coal projects.” International Energy Agency, May 2021

The NSW Government has committed to a strategy to transition rapidly to renewable energy generation and storage, effectively reducing Greenhouse gas emissions and creating secure and sustainable jobs. This commitment is clearly articulated in the Electricity Infrastructure Roadmap enacted into law on 2 December 2020.

<https://energy.nsw.gov.au/government-and-regulation/electricity-infrastructure-roadmap>

Contrary to the claim made in the EIS (on page 58), the proposed Power Station is inconsistent with this NSW Government policy.

The Roadmap aims to help NSW deliver on its ambitions to reach net zero emissions by 2050 and to reduce NSW electricity emissions by 90 million tonnes by 2030.

The NSW Government's commitment to a transition from fossil fuels to renewable energy is also clearly articulated in the Net Zero Plan Stage 1: 2020–2030 Plan, which aims to achieve net zero emissions by 2050 by creating new jobs, cutting household costs and attracting investment. [2]

The proposed Hunter Power Project is incompatible with the commitment made by NSW Energy and Environment Minister Matt Kean for NSW to become a “renewable energy superpower”. The Roadmap clearly differentiates the NSW Government's approach to energy from the Commonwealth's reliance on a “gas-led recovery”. It could see renewable energy increase from 16% of energy generated in NSW to more than 60%. “Using gas to create electricity is a really expensive way to do it. If you're interested in driving down electricity prices, then you'd be mad to use gas.” Matt Kean, NSW Energy & Environment Minister

We can meet energy demand through a combination of renewable energy and battery storage. The EIS acknowledges that a combination of grid-scale batteries and fast-start-turbines could provide dispatchable capacity and meet demands when the needs of electricity consumers are highest (p.x). Further, the EIS states that “the cost of batteries is falling, making storage an increasingly commercially viable option” (p.52).

Health Impacts - The plant will initially run on highly polluting diesel

As a parent I am concerned about any health implications for people living in close proximity to the site. I would rather that families had access to safe environments for their children to play in.

Over 20% of local residents (in Cessnock LGA and Kurri Kurri-Abemain SA2) are aged 14 and under, and about 63% are families with children according to the [Environmental Impact Statement](#).

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-12590060%2120210427T001516.283%20G>
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Morrison government bankrolls \$600m Hunter Valley gas plant
"The Singleton doctor Bob Vickers, a member of Doctors for the Environment, said the new gas plant would add air pollution in mining, refining, transporting and combusting the gas."

<https://www.smh.com.au/politics/federal/morrison-government-bankrolls-600m-hunter-valley-gas-plant-20210519-p57t2u.html>

Pollution from the proposed Kurri-Kurri Power Station is likely to be even worse than Snowy Hydro has disclosed. Snowy Hydro's [Environmental Impact Statement](#) specifically states that its air pollution analysis excludes emissions at start up/shutdown. But this power plant is designed to operate intermittently - it is only really expected to operate at 2-12% of its maximum capacity, during periods of peak demand.

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-12590060%2120210427T001516.283%20GMT>

Start-up and shutdown periods will add significantly to Snowy Hydro's pollution forecasts. A [2016 Californian study](#) found gas power stations to emit 3-7x as much NOx during start-up than during one hour of full-load operation.

<https://www.caiso.com/Documents/SB350Study-Volume9EnvironmentalStudy.pdf>

The proposal contradicts the [NSW Clean Air Strategy 2021-30](#), which promises to deliver "Clean Energy for Clean Air" by supporting "private sector investment in new clean energy generation, under the NSW Electricity Infrastructure Roadmap, to replace ageing fossil fuel-powered generators as they retire in coming decades."

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Air/nsw-clean-air-strategy-2021-30-draft-for-consultation-210080.pdf>