

19 October 2021

To:	From:
Director – Resource Assessments, Planning and Assessment Department of Planning, Industry and Environment, Locked Bag 5022 PARRAMATTA NSW 2124	Tony Phillips Group Manager Operations – Eraring Eraring Power Station, PO Box 5044 ERARING NSW 2264

Re: Newstan Mine Extension Project – Application No. SSD-10333

Origin Energy (Eraring) Pty Ltd (Origin) owns and operates Eraring Power Station (EPS) and is a key stakeholder in Centennial Coal's (Centennial) proposed Newstan Mine Extension Project (the Proposed Project), noting that the proposed mining area extends under EPS assets. Critical assets of concern that are proposed to be mined under, or are in the proximity of the mining area, include the ash dam, rail loop / coal unloader, coal stockpile, coal handling plant, cooling water system, and turbine/generator system, as well as large number of underground services.

Origin object to the Proposed Project as described in the Environmental Impact Statement (EIS).

Centennial consulted with Origin on a number of occasions during the preparation of its Environmental Impact Statement (EIS), where Origin expressed concern regarding the potential impacts from the Proposed Project on EPS and Origin land holdings. This consultation is acknowledged in the EIS for the period up to 2 December 2019. Origin continued to discuss the Proposed Project with Centennial during 2020 and continued to express its concerns regarding the potential impact on the safe and reliable operation of EPS, which is Australia's largest power station and critical to Australia's energy supply and security.

Origin's objection to the Proposed Project results from the expected mine subsidence and its potential to result in significant impacts to the EPS, for example irreversible damage to plant and equipment. If not prevented or mitigated, these impacts may result in extended periods of forced outages and loss of electricity supply at EPS which will jeopardise energy security in NSW and the National Electricity Market (NEM) as well resulting in substantial financial liabilities. Origin's view has been informed by independent third-party assessment of the predicted mine subsidence by specialist geotechnical, mine subsidence and ecological advisors.

With regards to ecology the extent of impact on EPS land presented by the EIS is uncertain and this will impact on Origin's ability to manage land in accordance with our approval requirements and operating licences.

For many of the EPS assets, outright prevention of subsidence will be required to ensure safe and reliable operation of the power station rather than reactive management with protocols such as Trigger Action Response Plans (TARPS) as set out in the EIS. In many cases, repairing damage after mining is not a solution – the damage will need to be prevented such that intolerable loss of electricity supply and other residual impacts including safety and environmental impact do not occur.

Origin is also concerned about the substantial ongoing monitoring and management burden to engage with Centennial and other stakeholders on subsidence management associated with the proposed mine plan. This would extend throughout the mining period and following the completion of mining to manage legacy issues.

We propose that Centennial consult further with Origin and reach prior agreement on a mining plan that avoids impacting on EPS assets and the subsequent risk to NSW energy security.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'TPH', is positioned above the typed name and title.

Tony Phillips
Group Manager Operations Eraring Generation
Origin Energy

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