

Good day [REDACTED]

Save Our Surroundings (SOS) have reviewed the Proponent's response to submissions. We see that the Proponent has ignored responding to our submission concerns. Only our name was listed as a submission in Appendix G – Submissions Register and did not even show that we objected. We attach our submission for your convenience.

Appendix G does not show SOS has raising any issues. We raised at least 11 categories of issues with the EIS, none of which were addressed by the Proponent's response. This is unacceptable and we request that you obtain full and complete responses to the issues we raised as an addendum to the Proponent's Response to Submissions.

In addition to raising issues under the Proponent's headings of Biodiversity, Justification, Visual, Noise, Socio-economic we raised issues that include Inconsistent Information, Cumulative Impacts, Financial Viability, Ownership Changes, Misleading Information and Inadequate Comparisons.

[REDACTED] and [REDACTED] signed the declaration stating that *"The information contained in this EIS, to the best of our knowledge, contains all available information that is relevant to the environmental assessment of the development and the information provided is neither false or misleading."* It is our opinion that just the few examples we included in our submission do indicate that the information would mislead a reader, especially one who does not have a good understanding of the electricity system. Our submission included the following issues with the EIS:

1. **Biodiversity:** "environmentally damaging"; "68km² appears an enormous waste of resources and destruction of bushland and agricultural land for such an intermittent, unreliable, weather impacted source of electricity generation"
2. **Justification:** "...is not fit for purpose"; "does the claim that the wind project is necessary to replace the output of Liddell power station when it closes completely in April 2023 stack up?"; "...avoid a proper understanding of the options, particularly those that can produce electricity at least 90% of the time compared to the wind works estimated 30% a year."; "This proposed project will do little to address the already compromised energy needs of NSW, let alone, Australia. In fact, it will make it worse as evidenced by overseas experiences in recent years and our own experiences in 2022 with soaring electricity prices, blackouts, energy rationing and business closures predicted for years to come."
3. **Visual:** "...scarring 24km of bushland mountain tops, "...further scars 23kms of transmission lines and associated infrastructure"
4. **Noise:** "audible noise ...; however infrasound ... can travel ..(up to 13km)"; "...may adversely affect the health of these people and animals"
5. **Socio-economic:** "electricity available on average 7 hours a day"; "28 operating jobs is a poor return for the communities around this project"; "the wind works operating staff of 28 is much lower than a base-load power station, which also provides such jobs for at least twice as long (> 50 years)"; the project will make our electricity system "...worse as evidenced by overseas experiences in recent years and our own experiences in 2022 with soaring electricity prices, blackouts, energy rationing and business closures predicted for years to come."

6. **Inconsistent Information:** “inconsistency of information on the proponent's web-site and documentation,...”; “;... it can't be 65 or 70 6MW turbines and still have a capacity of 420MW”; “which is it, 1000GWh or 1100MWh annually”
7. **Cumulative Impacts:** “the cumulative impacts of this project, the Liverpool Ranges, Liverpool Plains and numerous CWO REZ projects that will result in years of disruption to their lives, damage to roads, loss of tourism, traffic delays, etc.”
8. **Financial Viability:** “a project value of \$750M, based on NREL modelling and other studies, indicates that about 75% (\$563m) is for imported equipment; 12.5% capital cost (\$94m) and 12.5% (\$93m) for construction; not much Australian content in this project!” “is this current project owner for Hills of Gold Wind in it for the long haul of 25 years plus decommissioning/rehabilitation time or are they just a typical construction firm that builds and sells, like several other such projects?”
9. **Ownership Changes:** “Original EIS Nov 2018 by Wind Energy Partners ; Engie bought out Wind Energy Partners on 28/11/2020”; “is this current project owner for Hills of Gold Wind in it for the long haul of 25 years plus decommissioning/rehabilitation time or are they just a typical construction firm that builds and sells, like several other such projects?”
10. **Misleading Information:** “claims it will supply electricity to 185,000 homes”; “Claim the project output is needed to offset the closure of Liddell power station.” “the capacity of the wind works is not equivalent to a similar base-load power plant e.g. the 420MW for the wind project equates to only about a 140MW base-load power station”; “The non-equivalence of capacity values results in misleading the general public and others, as does the omission of capacity factors.”
11. **Inadequate Comparisons:** “the wind works capacity factor (29.9%) is vastly inferior to even a 50 years old based-load power station (54.4%); modern base-load power stations have capacity factors above 90%. [capacity factor is the ratio of actual or estimated output to the potential 24/7 output over a year based on the stated maximum capacity of the power plant]”; “The SEARS requires proponents to include a comparison with alternatives to their project but they do not do so.”

Regards



For Save Our Surroundings (SOS)

Save Our Surroundings (SOS) is part of network of groups of like-minded concerned and impacted citizens that are directly affected of industrial scale weather-dependent “renewables” and their negative impacts on local and global environments and communities. groups span multiple States and share and distribute information, research and experiences with each other and other parties.