

**The Independent Planning Commission**

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15 July 2024

*Dear Panel Chair and Commissioners*

**Addendum to Re Submission -Hills of Gold Wind Farm (SSD-9679)**

On 10 July 2024 I made my submission in relation to the additional material provided by the Applicant and Others into the above project.

On review I think I would like to add to my Comments Pages 3 and 4 on the IEAPET Report. In this regard I comment on the inappropriate reliance by the Expert Panel on the data from the ISP 2024 and the GenCost Report. Three additional points I would make:

1. There is no evidence in GenCost Data that the Expert Panel take account in drawing conclusions on the LCOE that any storage or transmission costs have been included in the suggested benchmarks and other viability metrics at least before 2030. This distorts the real LCOE which will inevitably higher.
2. The GenCost model seems to assume favourable weather and flexible gas capacity -at a time when the project profile is enduring poor weather -wind and solar drought.
3. GenCost does not take account of the system being an integrated – therefore HoG as an uneconomic individual project is allowed to be passed on to consumers.

These points need evaluation and reasoning by the IPC.

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