



NATIONAL RATIONAL ENERGY NETWORK INCORPORATED

**To protect and advance public welfare and the natural environment by opposing Commonwealth, State or Territory Law, or Corporate actions, that impose counterproductive energy policies and costs on all citizens.**

[nren.chair@gmail.com](mailto:nren.chair@gmail.com)

<https://www.nren.com.au/>

**Spicers Creek Wind Farm (SSD-41134610)**

**117 turbines, 700MW, 395,000 homes?**

- Wind power reliability and conversion is grossly inefficient and only produces on average 29% of its installed capacity according to AEMO 2022 data. 29% is two days a week. Can the Commissioners please tell us where the 395,000 homes will get their power from the other five days of the week?
- If approved, will the Commissioners define dispatchable power performance standards to be met by Spicer's Creek, in line with CSIRO GENCOST modelling of above 40%, with penalties for underperformance?
- With a short working life of maybe 20 years and the loss in efficiency over time, wind turbines will have to be replaced 3-4 times during the life of a conventional thermal power station, incurring multiple whole-of-life emissions as well as further local environmental degradation and economic cost.

- Battery storage produces no power at a high environmental cost, due to the sunk energy and materials used in their manufacture, and their even shorter working life than wind turbines. The short life again incurs a recurring remove and replace environmental and emissions cost. Uncontrollable battery fires are another serious hazard to the local community.
- Due to the distributed nature of solar and wind, additional transmission lines are needed, which further adds to the environmental cost, and which until now have been unnecessary.
- All this leads to the conclusion that wind turbine projects like this one are counterproductive to the stated aims of cheap, reliable and environmentally friendly power.
- The CWOREZ is approved for 4.5GW dispatchable power with expansion to 8GW in planning. There are 54 projects listed for the REZ so far totalling 14.6GW, comprising of 1024 wind turbines and 9 million solar panels, plus numerous BESS. For perspective the whole of NSW consumes 8-11GW at any time, yet in one REZ we may have 14.6GW alone!
- The Commissioners must consider this massive overbuild and the economic and environmental cost due to this gross inefficiency.
- Squadron has an approved project to install a gas turbine at Dubbo, which shows the planning authorities know that despite Dubbo being surrounded by 14.6GW of installed capacity, a gas turbine will still be needed.
- What conditions is the IPC imposing on Squadron to ensure the operating company does not disappear leaving decommissioning and cleanup costs to landowners and taxpayers?

- We cannot trust the NSW Government's intentions regarding farming and food production. The NSW Emissions Reduction Act 2023 which is touted to codify the 2015 Paris Agreement principles, excluded the proviso '... low greenhouse gas emissions development, in a manner that does not threaten food production'. (Article 2 (1)(b) cf. Section 3(1)(c)).
- GENCOST and AEMO ISP are deficient and cannot be quoted as reliable information in regard to least-cost or most efficient development pathway. Both have been debunked by experts and organisation working in this field.
- The NEL (section attached separately) does not prioritise emission reduction over the other longstanding objectives of 'price, quality, safety and security'. The IPC must consider these objectives equal in priority when assessing novel power generation projects such as Spicer's Creek..
- The NEL was only amended in September 2023 to include emissions targets as an additional Objective, and even then hedged their bets by included the phrase '...likely to contribute to reducing.....emissions'. It does not sound like the legal advice was confident that these projects **would** reduce emissions, and so they included a legal 'out' for future indemnity when the current Government policy is finally publicly acknowledged to be absurd, destructive and counterproductive.
- The Commissioners must consider the whole-of-life emissions of the project – have you done so? This calculation would include raw materials mining, transport, manufacture, installation, decommissioning, any recycling emissions and the multiple replacements needed per the above. not just the operating emissions. Could the Commissioners provide

their calculations of total emissions in their report please?

- Squadron is here to take advantage of our generous subsidy scheme for wind turbines, and when that fails make more money running emergency backup gas turbines at Dubbo under AEMOs Frequency Control Ancillary Services (FCAS) scheme.
- Wind projects such as the Spicer's Creek project have no electrical power engineering merit, economic justification, nor environmental benefit, and should not be approved without stringent performance standards and heavy oversight.

Grant Piper AASM, DFSM  
MRAeS  
BE(Aero) UNSW 1986  
Chair  
NREN Inc.  
Uarbry Tongy Lane Alliance Inc.  
Vice-Chair  
CWOREZist Inc.

### 3 Purpose of Act

- (1) The purpose of this Act is to give effect to the international commitment established through the 2015 Paris Agreement to—
  - (a) hold the increase in the global average temperature to well below 2°C above pre-industrial levels, and
  - (b) pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels, and
  - (c) increase the ability to adapt to the adverse impacts of climate change.
- (2) The Parliament of New South Wales, in enacting this Act, recognises—
  - (a) there is a scientific consensus that human activity is causing abnormal changes to the climate, and
  - (b) action is urgently required to reduce greenhouse gas emissions and to address the adverse impacts of climate change.
- (3) The Parliament of New South Wales, in enacting this Act, is committed to effective action on climate change to ensure a sustainable and fair future for the people, economy and environment of New South Wales.

### Article 2

1. This Agreement, in enhancing the implementation of the Convention, including its objective, aims to strengthen the global response to the threat of climate change, in the context of sustainable development and efforts to eradicate poverty, including by:

- (a) Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change;
- (b) Increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production; and
- (c) Making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.

NEL Amendment Sep 2023

The Amended Objective became law with effect from 23 September 2023. The amended portions of the National Electricity Objective are underlined below:

**[4] 7 National electricity objective**

*The objective of this Law is to promote efficient investment in, and efficient operation and use of, electricity services for the long term interests of consumers of electricity with respect to—*

*(a) price, quality, safety, reliability and security of supply of electricity; and*

*(b) the reliability, safety and security of the national electricity system; and*

*(c) the achievement of targets set by a participating jurisdiction—*

*(i) for reducing Australia's greenhouse gas emissions; or*

*(ii) that are likely to contribute to reducing Australia's greenhouse gas emissions.*

**Note—**

*The AEMC must publish targets in a targets statement: see section 32A.*