

# **NREN** NATIONAL RATIONAL ENERGY NETWORK

## **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.**

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

Middlebrook Solar SSD-10455

320MW/780MWh BESS

- Total/ERN is a foreign owned company that does not have the good of local residents, or the Nation, at heart.
- Total is here to take advantage of our generous subsidy scheme and book profit overseas in a low tax jurisdiction.
- These facts are the basis for how the project should be viewed and assessed.
- Solar is grossly inefficient and only produces on average 20% of its installed capacity (AEMO 2022 data).
- The whole-of life, including disposal, emission and environmental effects needs to be

considered, not just the operating emissions.

- With a short working life solar would have to be replaced several times during the life of a conventional thermal power stations, incurring even more environmental and economic cost.
- This leads to the conclusion that solar is counterproductive to the stated aims of cheap, reliable and environmentally friendly power.
- Due to the distributed nature of solar and wind lengthy additional transmission lines are needed, which further adds to the environmental cost, and which until now has been unnecessary.
- The addition of large storage batteries destroy any environmental credentials further, due to their whole-of-life environmental impact and short life. And batteries produce no power at all.
- The proponent's EIS states that to meet emissions targets projects will be required inside and outside of the REZs. Why then promulgate REZs? Currently the CWOREZ has 54 listed projects totalling 14.6GW of installed capacity, yet is approved for 4.5GW. This confirms the massive overbuild required, at great environmental, economic and human cost, to hopefully achieve only 1/3 of the installed capacity.
- Add to this there are five defined REZs in NSW, plus projects outside of REZs like Middlebrook, yet NSW consumes 'only' 8-11GW from the grid at any time. This starkly highlights the absolute inefficiency and unreliability of solar and wind energy generation.

- To further indicate that these shortcomings are known within the halls of power, Dubbo in the centre of the CWOOREZ will have a gas turbine because they know all the solar and wind will not be reliable!
- Middlebrook solar and the other projects are just the beginning, as they indicate in the EIS, and their impacts on farmland and the environment should not be considered in isolation.
- Future expansion of projects and the total impact on communities, environment, agricultural production and cost to citizens must be considered, and compared to alternative methods of bulk power production, including conventional thermal plants.
- Middlebrook is to be built on productive fertile farmland. We cannot trust the NSW Government's intentions regarding farming and food production when they remove '...in a manner that does not threaten food production' from the Emissions Reduction Act 2023, Section 3(1)(c), which is touted to codify the 2015 Paris Agreement principles (provided separately), which does include this proviso (Article 2 (1)(b)).
- 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 organisations 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'. These objectives must be at least equal in priority when assessing novel power generation projects. This nullifies legally any justification for approving the project citing 'the greater good'.

- The NEL amendment added emissions targets as an objective only in Sep 2023, and even then hedged their bets by including '...likely to contribute to reducing.....emissions'.
- The legal advice was not 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.
- Large solar harvesting plantations such as the Total Middlebrook project have no electrical power engineering merit, economic justification, nor environmental benefit, and should not be approved.

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