

Dear Sir/Madam,

I have the following comments and criticisms of the draft GenCost report provided for comment.

Nuclear power scenarios

The continued focus on SMR reactor technologies that have yet to be built is misleading for two reasons. First there are existing SMR designs (Chinese and Russian) in operational service, second that larger and more economical reactor designs are also currently available and much cheaper. The argument that the AEMO deprecates large generators on the basis of supply stability is also misleading as it is based on an original (single) unit power station proposal. No real world design would be deployed in anything other than multi-unit configurations. This whole section is simply filled with cherry picking of data and I have to say disappointing.

Capacity factors

The previous published 2023 report contained data and graphs on the actual capacity factor (c.f) performance of wind and solar showing that over time it was stagnant (wind) or degrading (solar). The current version does not, why is this? Regardless as c.f affects LCoE estimates this should be reincluded and LCoE calculations based on what is being achieved in reality, versus hope based estimates.

General

Overall I found the report to misleading and extremely disappointing. The CSIRO authors need to do better.

Matthew Squair
MSysEng MIEAust CPEng