



Save the Mary River Coordinating Group

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13/8/2024

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Dear Sir/Madam,

SUBMISSION: To inform the Scenarios for AEMO 2025 IASR

The Save the Mary River Coordinating Group Inc (STMRCG) is a community-based group that continues to protect the health of the Mary River. It has a committee comprising of landholders in the Mary Valley region and demonstrated very substantial community support for its legitimacy and its actions. It has members from a wide range of professional backgrounds including expertise relevant to the issues required to be addressed in this submission.

Thank you for the opportunity to provide the following 2 comments to inform the development of scenarios for the 2025 Inputs, Assumptions and Scenarios Report (IASR).

1. Remove the “Anticipated” status of Borumba Pumped Hydro Energy Storage Project i

Under section 4 Jurisdictional policies for renewable energy zones in Table 5 Queensland Government the AEMO’s comments made were:

“Development of Borumba Pumped Hydro Energy Storage (PHES- now classified as an Anticipated project under AEMO’s generation commitment criteria) “ and Under the draft 2024 ISP modelling and results (Step Change scenario) “Borumba Pumped Hydro Energy Storage is an anticipated project in all modelling.”

From the Glossary of the Regulatory investment test for transmission the definition of an “Anticipated” project is defined as a project which does not meet all of the criteria of a committed project as defined in this glossary, and is in the process of meeting at least three of the criteria for a committed project.

A committed project is “a project that meets the following criteria:

- the proponent has obtained all required planning consents, construction approvals and licenses, including completion and acceptance of any necessary environmental impact statement;
- construction has either commenced or a firm commencement date has been set;
- the proponent has purchased/settled/acquired land (or commenced legal proceedings to acquire land) for the purposes of construction:
 - contracts for supply and construction of the major components of the necessary plant and equipment (such as generators, turbines, boilers, transmission towers, conductors, terminal station equipment) have been finalised and executed, including any provisions for cancellation payments; and
 - the necessary financing arrangements, including any debt plans, have been finalised and contracts executed.”

We question the assumption in the 2024 Integrated System Plan that the Borumba Pumped Hydro Project meets at least three of the criteria for a committed project to be an “Anticipated”

1. **No Environmental Approvals.** Qld Hydro, the proponent, has no federal environmental approvals under the EPBC Act yet for even the Exploratory Works (to gather more information on the geology and hydrology of the proposed site) or the Main Works. Both the Exploratory Works and the Main Works have been called in as a controlled action. It has been over a year since the DCCEEW requested more information for the Preliminary Documentation of the Exploratory Works for assessment.

The Terms of Reference for the EIS for the main works is still to be finalized.

This project is a high risk to the endangered species and threatened ecological communities of the Mary River Catchment and the Internationally recognized wetlands, The Great Sandy Strait. In 2009, the Traveston Crossing Dam proposal was overturned by the EPBC Act to protect this river and its special endangered species, the Mary River Turtle, Mary River Cod and Australian Lungfish. The Mary River is also in the catchment of the Great Barrier Reef with special reef regulations to protect it. In addition, dams emit significant methane gases of which there has been no accounting for in the AEMO scenarios.

So there are no federal planning consents, no construction approvals and licenses, and no EIS completed or accepted. And for that matter, no social licence for the dam or the transmission lines, which are facilitated environmental and social impacts.

2. **No construction** has either commenced or a firm commencement date has been set. Some preliminary access track upgrades have taken place by Council.
3. **Yes** the proponent has purchased/settled/acquired land for the purposes of construction.
4. **No** contracts for supply and construction of the major components of the necessary plant and equipment (such as generators, turbines, boilers, transmission towers, conductors, terminal station equipment) have been finalised and executed, including any provisions for cancellation payments; and
5. **No** to the necessary financing arrangements, including any debt plans, have been finalised and contracts executed. There has been some money allocated to try to buy social licence and start environmental baseline studies, fix a few tracks and a token number of drill holes.

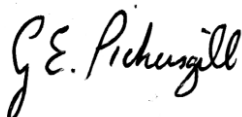
The optimal development path in the 2024 ISP did not give confidence for deliver of reliable, secure and affordable electricity through the NEM, and reduce Australia's greenhouse gas emissions. It assumed that 2 Pumped Hydro Energy Storage (PHES) projects in Qld are going ahead with no options to consider that they will not be approved. It assumes social licence for PHES and associated transmission lines which clearly it does not have with so many action groups opposing. Scenarios in the 2025 IASR should include options that do not include the PHES projects as "Anticipated".

2. Electric water heaters used as home batteries

As water heating can be up to 40% of energy use in the home, we request that scenarios that include electric water heaters being used as home batteries be included in the IASR. This would be a simple switch from heating water at night on a night tariff to heating during the day when solar energy is peaking on the Grid. <https://reneweconomy.com.au/electric-water-heaters-could-do-work-of-2-million-home-batteries-and-save-billions/>

We request the opportunity to provide further submissions if necessary. If you wish to discuss any of the issues raised in this submission, please contact me at glendap5@gmail.com.

Yours Sincerely,



Glenda Pickersgill *President, Save the Mary River Coordinating Group Inc.*