

Submission on the draft AEMO 2024 Integrated System Plan (ISP)

The Mary River Catchment Coordinating Committee (MRCCC) would like to provide specific comment on questions 2 and 5 in the invitation to comment on the 2024 Draft ISP, specifically regarding the Borumba PHES assumed to be *committed or anticipated* in the systems modelling underlying the draft ISP.

The MRCCC was formed in 1993 to represent the body of community, industry and government stakeholders with interests in integrated catchment management in the Mary River catchment (Qld). Today the committee is comprised of 28 interest sectors or delegates, and has an office based in Gympie with support staff. Specifically, the MRCCC has been engaged in consultation with the relevant State and Federal government departments associated with water and energy planning involving the Borumba PHES proposal, and the construction and operation of the project with PowerLink and Queensland Hydro.

We cannot support the inclusion of the Borumba PHES proposal as *committed or anticipated* in the 2024 ISP, primarily because this implicitly prevents AEMO from investigating any alternatives to the project which may have:

- less financial and project delivery risk,
- less hydrological risk
- less social impact,
- less unmitigable impact on biodiversity,
- less direct scope 1 carbon emissions,
- more long term flexibility in staging, location and potential for adopting other rapidly emerging storage technologies and network strategies to balance the grid.

We believe that AEMO not even considering any alternatives to Borumba PHES in the ISP is a very risky and short-sighted approach, given that not even the preliminary exploration works for the project have been assessed or granted federal approval, yet the ISP assumes that the project will be fully constructed and operational by 2030, and that by 2032 will be typically operating at its peak projected capacity of 2 GW. This is a very big assumption to get wrong in the ISP modelling, if the project does not proceed according to these implausible time lines and targets.

If it proceeds, the project would directly cause the unmitigable loss of significant areas of ecological communities and habitat requirements for species listed as critically endangered under the EPBC Act, for which the proponent will be unable to provide suitable offsets under current federal legislation. Studies may yet show that it is one of those major infrastructure projects that simply cannot be legally approved by the Federal environment minister, like the Traveston Crossing Dam or the Victorian Renewable Energy Terminal.

*The MRCCC gratefully acknowledges the support of
The Sunshine Coast Council, Noosa Council and Gympie Regional Council,
the Australian Government Department of Environment, the Burnett Mary Regional Group, the Queensland Department
of Main Roads, the Department of Environment and Science, Seqwater, HQPlantations
and landholders throughout the Mary Catchment.*

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In addition to this overarching concern, investigation of the model assumptions listed in the *Draft 2024 ISP Inputs and Assumptions workbook* with respect to this project has raised several issues:

- Why is the Borumba PHES listed in the worksheet as being in the Banana REZ, not the Wide Bay REZ or the Southern QREZ?
- We simply cannot support the assumption of zero carbon emissions for the Borumba PHES storage in the ISP. Ongoing methane and net CO₂ emissions from the new storage and increased existing storage surface area built specifically for the PHES are directly attributable Scope 1 emissions – they would not exist without the construction and operation of the project. In fact, these emissions would mean that the ISP locks in 48GWh of what could arguable be the most carbon-intensive form of electrical storage currently available for the next 50 years or more – without investigating alternatives. This is surely contrary to the objectives of the ISP.
- We assume that carbon emissions from the 24% storage efficiency losses attributed to Borumba are accounted for elsewhere, similarly for other battery projects and connection losses.

In summary, the MRCCC strongly suggests that either this or future ISPs actively investigate scenarios that do not simply assume the stated operation of the Borumba PHES as currently embedded, and allow the investigation of other, possibly more optimal, alternatives.

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