

3 March 2021

Attention: Department of State Growth
Tasmanian Government

By email: renewableenergy@stategrowth.tas.gov.au

Dear Minister Barnett,

Draft Renewable Energy Coordination Framework

Thank you for the opportunity to respond to your government's draft Renewable Energy Coordination Framework.

We commend you on a well-presented document that communicates its critical message in a clear, factual, rational and concise manner.

This well-articulated document states the purpose of the Tasmanian government which is to utilise Tasmania's excellent wind and hydro resources to maximise the opportunities presented by the closure of coal generation across the National Electricity Market (NEM) by building renewable energy projects and capturing a significant portion of the benefits on offer to all NEM states.

In a global economy investor confidence is pivotal for capturing economic opportunities. The degree to which a Government's clearly articulated, and indeed legislated, position can make a difference can be seen by the willingness of experienced wind energy developers to invest in Tasmania. Recently the emergence of hydrogen export proposals - from Fortescue and Origin – further responds to the Tasmanian Government's bold vision for renewables and an emerging renewable hydrogen industry.

Epuron is an experienced developer of solar and wind projects with an 18-year track record. We have identified in Tasmania a number of excellent wind farm sites with strong connection capacity, enthusiastic freehold landowners and world-class wind resources. We strongly agree with the draft framework's recognition of the high capacity factors possible with wind power, particularly in the Midlands REZ. We understand the benefits new projects bring and equally understand the challenges of proposals that will bring changes in landscapes loved by communities.

In working along the pathway to approvals, with the consultation, communication and listening that we do, we also respond to government policy and follow the processes required in each jurisdiction. The clear articulation of the Tasmanian Government's target and the development of the roadmap towards achieving it assists all parties.

Acknowledging changes made to views and landscapes, renewable energy companies like Epuron seek to maximise the benefits of their projects for neighbours and for local communities through community benefit schemes. As there will be a number of projects in each Renewable Energy Zone, Epuron is aligned with the Government in looking to facilitate a strategic approach to schemes aimed at benefitting communities to ensure that projects are socially, environmentally and economically sustainable and bring targeted, optimized benefits.

We commend this Framework for spelling out the details of the Tasmanian Government's target. The new variable generation target proposed of 9,950 MW across the three AEMO Tasmanian Renewable Energy Zones would bring significant benefits.

Using Epuron's experience and understanding of how community benefits have been implemented in wind projects around the NEM and translating that to a basis of 10,000 MW of wind energy for example could mean:

Some of the potential benefits from 10,000 MW of renewable energy – indicative figures	
Community benefits	<ul style="list-style-type: none"> over \$5 million dollars to Tasmanian communities annually <ul style="list-style-type: none"> - assuming an annual payment of \$3,000* per 6MW turbine installed more than \$125 million over a 25-year wind farm term*
Landowner payments	<ul style="list-style-type: none"> \$50 million* annually in landowner payments across Tasmania <ul style="list-style-type: none"> - assuming a mainland average payment - results in significant flow-on spending and benefits locally \$1,250 million* in Tasmanian landowner payments over 25 years
Regional jobs	<ul style="list-style-type: none"> around 330 well-paid, well-trained, full-time operation and maintenance jobs in regional Tasmania – assuming 10 jobs per 300 MW in wind farm locations

*excluding indexation

An orderly transition towards the Tasmanian Renewable Energy Target minimises cost and risk for all and allows planning for the benefits that can flow. If the number of projects moving to construction is known and coordinated regionally it allows companies offering for example: construction, civil, electrical, transport, logistics and other services, to plan, to recruit, to skill up their workforce and to be ready to step into contracts with minimised supply and demand bottlenecks and layoffs. It also leaves a legacy of skilled, trained workers for the investments that follow.

We know that renewable energy pushes down electricity prices, and Tasmanian wind power is amongst the lowest cost sources of new generation in the NEM. There is an emerging market for green hydrogen. This will in turn bring more investment and more jobs to Tasmania as it becomes preferred supplier for energy exports to countries with limited ability to generate their own renewable energy but which also have 'net zero' targets for carbon emissions within the next 30 years.

We acknowledge the Government's clear explanation of Tasmania's unique situations. Tasmania has mainly State-owned enterprises in the stationary energy sector - generation, transmission and retail - and a government-controlled transmission connection to the National Electricity Market.

There are without doubt great opportunities associated with private generation engaging in the State's 200% target even when 100% has been achieved and the government controls export to market and retail options. Acknowledging the link between coal retirements on the mainland, the timing of export options and local demand changes and the sequencing challenges associated, it is appreciated that the Government will consider mechanisms to address the various barriers to the successful take up of its target.

A few specific issues are worthy of mention.

Planning Process

The role of the planning process is not well understood in communities. A flowchart showing the stages, requirements and opportunities for public submissions as a project moves through the planning process may be useful. Each project and company has their own version. A reader-friendly government version which aligns to the framework may assist.

Council decision-making

The high-investment development applications for the infrastructure projects required under the TRET are decided by local councils. The representative democracy embraced by this decision pathway is undisputed. Councils are required to make their decisions consistent with planning legislation and schemes. Resourcing constraints mean this may sometimes cause delays to projects and significant expense to councils. There may be an opportunity for independent planning guidance at the planning decision meetings of council.

Land tenure

Many land parcels in Tasmania are large. As infrastructure projects require secure tenure, registrable on title, it is often appropriate that the land be subdivided either for freehold or leasehold purposes. However, restrictive timeframes and subdivision requirements apply which are not always consistent with the timing or tenure requirements of such large projects. Certainty of tenure at the relevant time is a key requirement for such significant investment. We would be pleased to discuss this in more detail with the team at Renewables Tasmania.

Thank you for the opportunity to comment on the Framework. We look forward to working on our projects within your Framework to help achieve your targets.

Please do not hesitate to contact us if we can provide any further information.

Yours sincerely,



MARTIN POOLE
EXECUTIVE DIRECTOR
EPURON

Epuron Background

Epuron has been developing solar and wind energy projects in Australia since 2003. Our track record of renewable energy development in Australia is second to none. Our experience stretches from site identification, through all phases of development and into construction and operation. Epuron's primary focus is as an independent developer where completed development projects are transferred to various utilities, suppliers or financial partners at the capital investment stage.

Epuron is a founding signatory to the Clean Energy Council's Best Practice Charter for Renewable Energy Developments. We commit to honouring the Best Practice Charter in our renewable energy projects. We work closely with local communities and key stakeholders to provide broad social and environmental benefits.

Epuron is proudly Australian owned, and well placed to continue its success in developing solar and wind energy projects across the country.

Our completed projects include:

- Cullerin Range Wind Farm (30MW, NSW, built by Origin Energy)
- Gullen Range Wind Farm (165MW, NSW, built by Goldwind)
- White Rock Wind Farm (119 turbines, NSW, 175MW Stage 1 built by Goldwind)
- Silverton Wind Farm (598 turbines, NSW, 200MW Stage 1 built by AGL)
- Coppabella Wind Farm (79 turbines, NSW, sold to Goldwind, pre-construction)
- Rye Park Wind Farm (92 turbines, NSW, sold to Tilt Renewables, pre-construction)
- Clermont Solar Farm (90MWp, QLD, built by Wirsol)
- Nevertire Solar Farm (130MWp, NSW, under construction by Elliot Green Power)
- Katherine Solar Farm (32MWp, NT, built by ENI Australia)
- Liverpool Range Wind Farm (267 turbines, NSW, sold to Tilt Renewables)
- TKLN Solar Farm (1MWp, NT, designed, owned and operated by Epuron)
- Uterne Solar Farm (4MWp, NT, owned and operated by Epuron)
- Yulara Solar Farm (1.8MWp, NT, designed, owned and operated by Epuron)

Epuron has been assessing Tasmanian development opportunities since 2008 and began active development of renewable energy projects in 2014. Over that period we have identified a number of highly prospective sites.

Epuron's current Tasmanian developments include:

- George Town Solar Farm (6MWp, planning approved, grid approved)
- Wesley Vale Solar Farm (15MWp, planning approved, grid advanced)
- Western Plains Wind Farm (50MW, planning submission imminent, grid advanced)
- Hellyer Wind Farm (~150MW, 110kV connection proposed)
- Guildford Wind Farm (~300MW, 220kV connection proposed)
- St Patricks Plains Wind Farm (~300MW, 220kV connection proposed)