



129 Maitland St
Narrabri NSW 2390
Email: sally@geni.energy
Ph: 0459 944 778
www.geni.energy

Narrabri Shire Council
ATTN: Mr Rob Williams, General Manager
council@narrabri.nsw.gov.au
DUE: 5pm June 26th 2024

RE: Submission to the Renewable Energy Implementation Plan (REIP)

Dear Mr Williams,

The Geni.Energy board, staff and supporter base are the key stakeholders in the future of renewable energy in Narrabri Shire and we appreciate this opportunity to provide feedback on the REIP.

Having a visible presence in the main street of Narrabri has given us access to probably a couple of thousand people in the last four years, we have almost 1,000 supporters on our database and have helped local homes, farms and businesses install over 260kWh of batteries and over 620kW of solar, and we will complete a 500kWh community battery this year in the middle of Narrabri. All of these factors give us a good understanding of the local context of renewable energy.

We are disappointed that the REAP and REIP process has not engaged any locals to date to seek to understand the local context of the issues and opportunities.

The Consultation Paper provided to the community fails to provide any tangible actions that would allow us to assess the “feasibility and practical implementation”, as requested by this consultation step. It would seem that what is presented in the Consultation Paper is more like a SWOT analysis of a range of carbon abatement issues, rather than an “action and implementation plan” of “renewable energy” which was the original brief. Whilst carbon abatement is a useful outcome for the shire, I would question if the community is engaged enough for this to be useful at this time. Whereas there is widespread take up of renewable energy already, and most people can understand the savings to council by implementing renewable energy initiatives, which would be a more useful starting point.

We believe this is such a missed opportunity for Narrabri Shire at a time when we simply cannot afford to be late to the party.

Our community has already demonstrated strong support for renewables through a number of surveys and through its own high uptake of solar as well as through its support of Geni.Energy.

Our shire is now in a position where a number of larger scale renewable energy developers are knocking on our door and our community needs to be ready to capitalise on those benefits and ensure good long term outcomes. We do not feel that this Consultation Paper brings us any closer to this.

A useful strategy in this document would be to **co-design with the community** a principles document for good renewable energy development. These developments will create division, especially if people are not properly engaged or properly informed. A process to identify our acceptable principles will help achieve this.

At the end of our submission we have included the principles that Geni.Energy has started to develop through meetings with some stakeholders including Council staff, but it needs to be further developed and have broader acceptability.

We would like to draw to Council's attention the excellent work that has taken place in Hay Shire NSW, driven by the initiatives of the Council. We have already provided the Hay plan to a few council staff but it can also be found here (<https://www.hay.nsw.gov.au/DesktopModules/EasyDNNNews/DocumentDownload.ashx?portalid=0&moduleid=2174&articleid=1985&documentid=1754>) . The important thing is that the Council and the community worked together proactively and this is the type of process that Narrabri Shire Council should emulate in order to bring the community along with it and ensure the best outcomes for all.

In response to specific parts of the REIP:

3.1 Site Specific Actions

The lack of detail makes it impossible to provide feedback on the "feasibility and timing" as we are not aware of system sizes, likely costs and savings and the business model used for the electricity retailing. Whilst the dot points seem fine, there appears to not be any innovation or new business model ideas explored nor any data provided.

There is already wide scale take up of rooftop solar (44%) as well as much progress within the community towards renewable energy, and the community battery, none of which is recognised in the paper.

There appears to be no emphasis on supporting locals to fully electrify and power their lives by renewable energy. This is a glaring omission.

3.2 Energy Efficiency and Renewables

Many of these opportunities have been identified in the past and don't appear to have been further explored in detail (or not provided to the community). Some of the assumptions around batteries should be better referenced and justified with up-to-date information. The use of community batteries should be considered.

3.3 Waste

Given the emissions lense that the REIP has now taken, it gives natural priority to the waste issue, due to its high emissions intensity, however this takes precedence away from renewable energy which was the original intention of the REIP.

The possible solutions suggested for waste emissions do not have enough information to be able to provide constructive feedback.

3.4 Fleet Transition

We understood that there was already another line of work on this aspect currently underway for council that assessed the charging needs and locations. This section should be cross referenced with that work rather than doubling up. There is nothing concrete here to comment on and it makes no reference to the existing infrastructure. There is little to go on about how a council fleet transition may occur.

3.5 Water

We question the use “outback” to describe Narrabri, this terminology reduces the credibility of the work in the local context. It is questionable (at best) to assume the community cannot be educated and engaged on sustainable water use, saving water is a basic tenement of most rural people’s lives.

The major water users in the shire are coal mines and irrigated cropping and neither of these are listed in this section which is an oversight. This section also has too much emphasis compared with the need for a “Renewable Energy Implementation Plan”. The recommendations are vague.

3.6 Urban Greening

Again, the emphasis seems greater on these elements than renewable energy which is at odds with a REIP.

3.7 Land Management

Post mining land use is currently a very important topic in NSW and Narrabri Shire is relevant to that conversation given over 80,000 hectares is currently owned by mining companies who will cease to operate over the next couple of decades.

There are already agricultural managers in the shire undertaking sustainable land managing practices and this is not recognised.

3.8 Economic Development

Whilst sections 45 to 50 are useful, they seem incorrectly categorised under “economic development”, perhaps community development would be more applicable. Geni.Energy has already done considerable work and community engagement around these strategies that would be worth collaborating on.

The use of renewable energy as an economic development driver is a genuine strategy, especially combined with the feasibility assessment of a net zero precinct. A net zero precinct would be a useful strategy to utilise and progress the proposed Inland Port. This strategy seems to be completely missing here.

A number of large scale renewable energy projects are in various stages of the planning process in the Shire already and the development of community principles or a strategic direction on these is missing from the Paper.

Furthermore there could be economic development outcomes for local farms and businesses switching to renewable energy and this would be a useful strategy to include.

Community energy is an important part of the renewable landscape in Narrabri Shire and again this is omitted.

Thank you for initiating this process.
Regards

Sally Hunter
Managing Director
Geni.Energy



NORTHWEST NSW COMMUNITY EXPECTATIONS FROM RENEWABLE ENERGY, EV & STORAGE PROJECTS



QUALITY ENGAGEMENT

ENGAGEMENT THAT IS MORE THAN A TICK THE BOX. UNDERTAKEN BY LOCALS WHO UNDERSTAND THE LOCAL CONTEXT & THE BREADTH OF COMMUNITY. IT IS A GENUINE 2 WAY CONVERSATION.

LOCAL OPPORTUNITIES TO INVEST & MAKE DECISIONS

PROJECTS MUST INCLUDE LOCAL OPPORTUNITIES TO INVEST AND FOR INVOLVEMENT IN DECISION MAKING, THUS IMPROVING PROJECTS & LOCAL RESILIENCE.



APPROPRIATENESS

SCALE AND TYPE OF DEVELOPMENT MUST BE APPROPRIATE TO THE LOCAL CONTEXT. THIS IS GUIDED BY LOCAL INVOLVEMENT IN DECISION MAKING AND CONSULTATION. NO IMPACTS TO SIGNIFICANT ENVIRONMENTAL, CULTURAL & FARMING VALUES.



FIRST NATIONS PROMINENCE

FREE, INFORMED AND PRIOR CONSENT FROM TRADITIONAL OWNERS AND THEIR FAMILIES OF THE GOMEROI NATION.

LOCAL BENEFITS

MAXIMISING LOCAL CAPACITY BUILDING, JOBS, UPSKILLING, SERVICE PROVISION, BUSINESS OPPORTUNITIES, AFFORDABLE ENERGY AND FUNDING TO HELP OUR REGION PROSPER IN THE ENERGY TRANSITION.