

Thursday, 19 January 2023

To the Relevant Executive

Fire & Rescue NSW By emaill

Call For Public Comment : Draft TIS D22 / 107002

Dumaresq Solar Farm Pty Limited (Company) is the proponent developer of the large-scale Dumaresq Solar Farm located within the New South Wales / Queensland border region with the project site split by the QNI 330kV interconnector. The proposed renewable energy project (REP) includes both extensive PV panels and battery energy storage system.

We have read with interest New South Wales Fire and Rescue's draft technical information sheet (TIS) dated 22/107002 which seeks public comment.

The following feedback & perspective is provided which we hope assists in the formulation of any final TIS.

Minimum Technology Standards & Requirements

The draft TIS is comprehensive in its general approach to the development of the key heads for investigation in Fire Safety Studies. We do not believe, however, that sufficient weight is placed on the introduction of mandatory minimum standards for technology adoption when considering the challenges associated with dealing with any fire event in a remote location. In particular this includes the encouraging of adoption of technology that provides early detection of a potential or actual fire event.

Amplifying the current numerous remote REPs is the NSW Government ambitions in relation to various Renewable Energy Zones.

As a developer navigating the various requirements for Environmental Impact Statements, the need for the adoption of technology to optimise risk managed operations in a sustainable & responsible fashion is evident. Technology we are currently investigating for adoption includes:

- Bushfire / fire event simulation & prediction software.
- Monitoring / detection systems (including via Machine Learning / Artificial Intelligence) seeking to "predict" fire events.

Dumaresq Solar Farm Pty Limited

- Robust specialist field-based sensor technology, including technology based joint monitoring (today not a common area for attention).
- Automatic / rapid response deployment of various fire suppressant technologies.

We believe that as a part of any approval process some form of standardised approach in relation to the adoption of technology would be well-placed, and provide developers with clear guidance on acceptable strategies which should also assist in the streamlining of approvals.

Community contributions

All developers as a function of progress of projects engage with community including through a variety of financed initiatives.

Whilst there is no specific framework by which this community engagement is required we believe that there is a case to promote & introduce some level of minimum mandatory financial contribution for Rural Fire Service brigades in remote locations that are proximate to REPs.

Although not strictly a matter for the TIS it is hoped that outlining such an initiative here will receive wider support.

We hope that the above comments are constructive and thank you for the opportunity to submit.

Yours sincerely

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