

Dear AEMO

I note that for the CSIRO GenCost 2019-2020 Aurecon has been commissioned to produce the costs and technical parameters review in place of GHD.

The new Aurecon report does not include nuclear. The justification for this is that "there have been no major developments in these technologies since the previous report".

However the GHD report for nuclear produced a figure of \$16,000/kW capital cost for nuclear which was discredited several times during the Federal and NSW nuclear inquiries. In particular, GHD (GHD report table 57) gave the source of their \$16,000/kW figure as the World Nuclear Association and the WNA stated in evidence that they did not produce this figure and were not consulted by GHD.

It is therefore not technically accurate and inappropriate to include this figure in the 2029-2020 report.

With regard to "no major developments", NuScale are now in the final stages of licensing in the USA so the design is fully developed and reasonable estimates can be made of the capital cost. We would be happy to assist with this.

Although Aurecon did not include nuclear in the technical review, the draft CSIRO report fig 3-8 shows a drop to around \$7,000/kW in the Diverse Technology scenario and then no further decrease. The references and methodology for this should be included in the report.

I strongly suggest that:

- Aurecon should be asked to review the GHD \$16,000/kW capital cost for SMRs
- If not, the justification for the GHD figure should be included in the 2029-2020 report.
- The references and justification for Fig 3-8 Projected capital costs for nuclear SMR by scenario compared to two previous studies should be included in the report.

Regards

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