

A major issue is funding. Sunnica are inadequately financed and have no track record in projects such as this. Their latest filed accounts at Companies House show net liabilities (a deficit) of £423,669. The ultimate controlling company is Solaer Holdings, a Spanish company. The applicant, Sunnica, in their submission is using the accounts of Solaer Holdings to assert they have a financial substance sufficient to be considered to execute this £600M project.

1. The normal firewalls between companies and their subsidiaries mean that:
 - a. The Secretary of State would have no call on the assets of Solaer Holdings in the event of Sunnica's default on the project. Hence the proposal has the effect that :-
 - i. Sunnica would earn any profits from the project
 - ii. But should the project go drastically wrong, the Secretary of State would have to meet the losses/cost of restoring the land to its pre-project condition.
 - b. In the second place, Sunnica characterises itself as a joint venture between Tribus and PS Renewables () giving a further layer of firewalls between the Secretary of State and Solaer Holdings. Tribus, like Sunnica is a company with nugatory assets and PS Renewables, which is the trading name of Padero Solaer Limited, has total shareholder's funds of £1.783M (Companies House). PS Renewables list around 15 UK solar projects on its website; the largest is ~50MW with total installed capacity of 250MW but none mention a Battery Energy Storage System (BESS).
 - c. If Padero Solaer Holdings wished to put its own assets on the line behind this project, it could actually be applying for this Development Consent Order (DCO) itself, so it appears they do not wish to put their assets behind this project, but wish to shield themselves from the risks and the publicity surrounding a highly risky project.
 - d. In the fourth place, the applicant says the project will be funded by third party investors if it were approved. But they would have normal commercial firewalls between their own assets and failure of the project, which therefore doesn't change the risk to the Secretary of State or the exposure of us taxpayers to the risk.
2. The authority should not approve this project. Sunnica have no track record in any solar projects and importantly neither they nor PS Renewables have any track record in Battery Energy Storage Systems (BESS). BESS carry numerous risks; principally that around the world there have been multiple fires causing injuries and deaths and the spread of toxic chemicals over nearby areas. Rather than prudently learning by doing a small project, they are proposing a hugely risky project which they are not financed to undertake. If the authority should wish to nonetheless approve a DCO, they should insist on three things:
 - a. A definite outcome such as 500MW generation and 2.4 GW hour storage. Sunnica should not be given an exit whereby they can put only 50MW of generation and storage on 2500 acres; which is ten times the area a 50MW system would need. If Sunnica are only willing to commit to the lower 50MW generation then they should not be allowed to compulsorily purchase so much land.
 - b. Sunnica should have to deposit a bond at the outset equivalent to the cost of the project (£600M), which could reduce to the cost of restoring the land to its pre-project use at the end of the construction phase.
 - c. Sunnica have proposed that a bond be funded to supporting the cost of decommissioning from the revenues earned by generation in early years – Sunnica's lack of financial solidity should make the authority insist on this being funded by investment so that the Secretary of Fund does not have to fund decommissioning if Sunnica fail.