# BEFORE THE COMMISSIONERS APPOINTED BY THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER	Of clause 6 of the First Schedule of the Resource Management Act 1991
AND	
IN THE MATTER	the Queenstown Lakes District Council Proposed District Plan (Stage 3)
BETWEEN	AURORA ENERGY LIMITED

**Original Submission 3153** 

#### STATEMENT OF EVIDENCE OF JOANNE DOWD

#### GALLAWAY COOK ALLAN LAWYERS DUNEDIN

Solicitor on record: Bridget Irving Solicitor to contact: Simon Peirce P O Box 143, Dunedin 9054 Ph: (03) 477 7312 Fax: (03) 477 5564 Email: bridget.irving@gallawaycookallan.co.nz Email: simon.peirce@gallawaycookallan.co.nz

#### BRIEF OF EVIDENCE OF JOANNE DOWD

#### **Executive Summary**

- The focus of Aurora's submission in respect of Stream 16 is to enable the types of activities that are currently permitted under the PDP. There are two reasons for this:
  - (a) Aurora is proposing to undertake a significant (approximately 400 million) investment in renewing aging infrastructure across the network. A significant number of poles will be replaced across the District, many of which are located within Wahi Tupuna areas and in proximity to waterbodies. The replacement of underground cables involves a much greater level of earthworks compared to the replacement of poles and will easily breach the maximum volume threshold for earthworks.
  - (b) It is considered that the existing work Aurora has done to manage works in Archaeological Hazard Areas can be applied to managing works within Wāhi Tūpuna mapped areas. Aurora is continuing to develop its processes with Aukaha to ensure consultation is ongoing and that Kā Rūnaka's concerns are met.
- 2. The placement of underground cables and overhead lines are already excluded from the maximum earthworks volumes contained in Chapter 25 (Rule 25.3.2.8). It is not explicit in that rule whether "minor upgrading" activities such as the inspection, repair and upgrade of an existing underground cable is included within that rule. I consider that an amendment to Rule 25.3.2.8 by adding "minor upgrading" is an appropriate refinement of Aurora's relief on the variations to Chapter 25.
- 3. Aurora has a significant number of structures (poles and other small structures) in proximity to waterbodies. There is no ongoing impact on water quality once this infrastructure has been installed and there is no impediment to access to the waterbodies that might inhibit Mahika Kai. There may be sediment discharge as a result of the pole installation, where that pole is located directly within the waterbody, but this is a

temporary and minor effect which is otherwise managed by the rules in the Otago Regional Plan. I consider that the activities which Aurora can undertake as permitted or controlled activities in Rules 30.5.5.1 to 30.5.5.4 can appropriately be excluded. Activities which do not fall within those rules will require resource consent as a restricted discretionary activity though I consider that an additional matter of discretion is required to consider the functional needs of Aurora's infrastructure to give effect to the Strategic Directions contained in Chapters 3 and 6.

#### Introduction

- 4. My name is Joanne Dowd, I am the Resource Planning, Property and Environment Manager employed by Aurora Energy Limited (**Aurora**).
- 5. I set out my qualifications and experiences in my brief of evidence on Streams 17 and 18 filed 29 May 2020. However, for the benefit of the additional panel member who is not involved in those streams I repeat paragraphs [2]-[6] of that evidence below.
- 6. I hold a masters degree in Town and Country Planning from The Queens University of Belfast, obtained in 1993. I have been a full member of the UK Royal Town Planning Institute since 1997. I have been a member of the Resource Management Law Association since 2006. I sit on the Electricity Networks Association's (ENA) Resource and Environmental Planning Forum and I am an ENA representative on the Ministry for the Environment National Planning Template for Network Utilities Working Group. I am also a member of the Women's Infrastructure Network – WIN Otago/Southland. I am employed as Resource Planning, Property and Environment Manager at Aurora. Before that I was employed as the Network Policy Manager with Delta Utility Services Limited. I have been employed in my present position since July 2017 and I have 27 years international planning experience in both the private and public sector.
- At Aurora, I am responsible for all Resource Management Act 1991 (RMA) processes associated with development of the network. Recent projects I have been involved with include the designation and

associated regional council consenting of the Riverbank Road and Camphill Substations in Wanaka; and the Carrisbrook substation in Dunedin. I have also been involved in the consenting of our 33kV asset upgrades at Fernhill and consenting for the installation of our upgraded SCADA communications network which links our various substations within the District. In recent years, I have focused on providing consultancy advice with respect to regional and district plans, utility developments, resource consents and environmental management and environmental effects assessments.

- 8. As I am an employee of Aurora, I am unable to comply with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note. However, I have prepared this evidence with reference to it. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. Unless I state otherwise, this evidence is within the scope of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
- I have previously given evidence to hearings panel commissioners as part of the Stream 5 hearings on PDP Stage 1 in 2016. That evidence sought amendments to the notified chapters as part of PDP Stage 1, including to Chapters 3, 6 and 30.
- 10. I was also involved and attended mediations for Aurora in relation to the Proposed District Plan (PDP) Stage 1 appeals. I attended mediation on Topic 1 (Subtopic 4): A Resilient Economy, Topic 2 (Subtopic 11): Regionally Significant Infrastructure and Topic 17 (Chapter 30): Energy and Utilities. I reviewed and approved (on behalf of Aurora) the relief relevant to Aurora's appeal in relation to those subtopics and have knowledge of the matters that they relate to.
- 11. I repeat paragraphs [7] to [21] of my first brief of evidence on PDP Stage3 which outlines a high-level overview of Aurora's network and its approach to its submission.

- 12. In preparing this evidence I have reviewed the following briefs of evidence filed on behalf of Kā Rūnaka:
  - (a) Evidence of David Higgins;
  - (b) Evidence of Michael Bathgate (planning);
  - (c) Evidence of Maree Kleinlangvelsloo (planning);
  - (d) Evidence of Dr Lynette Carter;
  - (e) Evidence of Edward Ellison.
- 13. I have also reviewed the Section 42A Report of Sarah Helene Picard on behalf of Council on Chapter 39 Wāhi Tūpuna (section 42A Report) and the Section 42A Report of Craig Barr on behalf of Council regarding a strategic overview for all of PDP Stage 3.

#### Scope of Evidence

- 14. In this evidence I will address the following:
  - (a) Outline of Aurora's network.
  - (b) Proposed Upgrades to Aurora's network over the next 3 years.
  - Aurora's internal processes for managing works in Archaeological Hazard Areas
  - (d) Relief sought
    - (i) Chapter 25 Earthworks
    - (ii) Chapter 39 "Buildings and Structures"
  - (e) Conclusion

#### Outline of Aurora's network

15. In my brief of evidence on Streams 17 and 18 I provided a written explanation of Aurora's network, including the number of properties it provides electricity to and a breakdown of the types of infrastructure that is required to provide electricity like "electricity sub-transmission infrastructure" (**ESTI**) and "significant electricity distribution infrastructure" (**SEDI**).

16. To assist the hearing panel in viewing the overlap between Aurora's network and the Wāhi Tūpuna overlay Aurora has created a link to its AuroraGIS software which adds the Wāhi Tūpuna overlay on top of Aurora's network. The purpose of this map is to easily view the extent of overlap between Aurora's network and the Wāhi Tūpuna mapped areas. A link to this web map can be found in the footnotes of this document.<sup>1</sup>

#### Proposed Upgrades to Network

- 17. Aurora owns a significant amount of assets in the District which it must install, maintain and upgrade to provide a resilient electricity supply to the District. Furthermore, Aurora is the only electricity distribution network in the District with grid-exit points that provide the connection between the national grid and electricity sub-transmission infrastructure.
- 18. On 12 June 2020 Aurora made an application to the Commerce Commission for a Customised price-quality path (CPP)<sup>2</sup>. The purpose of the CPP is to enable it to undertake \$383.3 million investment in its network over three years on new assets, network maintenance and operations to deliver and support Aurora's electricity distribution service. This is a 20% increase above the latest three-year period. Of the total expenditure, Aurora plans to invest \$227.7million in new assets, which is a 21% increase above the latest three-year period.
- 19. The reasons for the additional investment over the next 3 years are as follows:

<sup>&</sup>lt;sup>1</sup> Link to ArcGIS mapping showing Wahi Tupuna Overlay with ESTI and SEDI <u>https://data-</u>

<sup>&</sup>lt;u>gldc.opendata.arcgis.com/datasets/69f9d063bf574933aaf6e43e8165ca8a?fullScree</u> <u>n=true&geometry=168.672%2C-45.056%2C168.837%2C-45.010</u>

<sup>&</sup>lt;sup>2</sup> Electricity distribution businesses initially start on a Default Price Path (DPP), which relies on relatively low cost approaches for setting price or revenue limits and minimum standards for quality of service. If a business believes the default path does not meet its needs, particularly in terms of future investment requirements, it can apply for a CPP. A customised path is tailored to the company's specific plans and requires us to complete a detailed assessment of its proposal before making a decision on what its price path and quality standards should be.

- (a) Address historical under-investment which has resulted in aging and degraded infrastructure.
- (b) Maintain elevated levels of infrastructure renewals to manage health and safety.
- (c) Growth and security investments to support regional growth and to provide the capacity for new customer connections. (I note here for completeness that a portion of growth investments have been deferred due to the expected impact of the Covid-19 pandemic).
- 20. Most of Aurora's three-year CPP spend will seek to renew aging infrastructure. A large proportion of the network was constructed during the 1950s-70s and, as many assets have an expected life of 50-60 years, a large proportion of the network has already or will soon become due for renewal. Information on poles in proximity to waterbodies at Attachment 2 highlights some of the aging infrastructure which will need to be replaced.
- 21. As part of the CPP Application process Aurora undertook significant public consultation and sought submissions about its proposed works and what the publics priorities were for the type of work that should be undertaken. Out of all those who participated in this process, 53% of participants were from Wanaka, Central Otago, and Queenstown. Participants were supportive of an increase in investment over the next 3 years as well as a focus on avoiding asset degradation in future.
- 22. The Commerce Commission is yet to decide the CPP application. Regardless of the outcome of that process, Aurora will still need to carry out a significant amount of investment to its network. That work was outlined in Aurora's 2018 and 2019 Asset Management Plans (**AMP**) and the scope of works has been updated in the 2020-2030 plans to align with the CPP proposals.
- 23. Much of the work that is planned during the CPP period (2021-2024) and throughout the AMP period are those types of works that are generally permitted under the PDP, including:

- (a) Overhead Line Support Structures/Poles: work to improve the health and safety, condition and reliability of poles throughout the district including replacing poor condition poles, reduce the wooden pole backlog to zero and to manage the risk of pole failure.
- (b) Cables: replacing cables that are a risk to the health and safety of the public.
- (c) Overhead conductors (lines): Replace poor condition overhead lines to reduce safety risks associated with line drop. Remedy low clearance spans to reduce third party contact risks.
- 24. Currently, Rules 30.5.5.1 to 30.5.5.4 enable these works to take place as permitted or controlled activities.
- 25. The work required to replace, or upgrade poles and cables often involves ground disturbance (earthworks) and therefore has the potential to affect Wāhi Tūpuna mapped areas. This appears to be what has given rise to the rules in Chapter 39 and variation to Chapter 25. In the case of overhead conductors, the installation of mid-span poles, or installing taller poles is often required to reduce line drop and low clearance spans. This work is undertaken to ensure that Aurora meets the mandatory requirements under the New Zealand Code of Practice for Electrical Safe Distances (NZECP34).

#### Wāhi Tūpuna Mapped Areas

26. PDP Stage 3 maps Wāhi Tūpuna areas which I understand from the evidence of Kā Rūnaka to be important cultural landscapes which cannot be broken down into individual sites (like Wāhi Tapu) and contain the basis for understanding Kai Tahu connection to place and values. In this way, I understand that a broader approach to the degradation of the landscape is required in addition to ensuring that individual activities do not degrade the natural landscape. In my view, it is appropriate to exclude activities which have less than minor effects on the landscape and which in the case of earthworks are temporary in nature and do not have an ongoing adverse effect on water quality.

#### Works within Archaeological Hazard Areas

- 27. There are approximately 3,500 archaeological sites recorded in the national database (ArchSite) and 480 heritage places listed in the HNZPT Rarangi Körero located in the Otago region and which are supplied electricity by Aurora. Undertaking works in proximity to known Wāhi Tapu or Archaeological Sites is therefore not a new phenomenon for Aurora. Any work that will affect archaeological sites requires an archaeological authority from Heritage New Zealand Pouhere Taonga (HNZPT) as set out in the Heritage New Zealand Pouhere Taonga Act 2014 and Aurora has developed processes and protocols for how works in these areas are: planned; managed and carried out.
- 28. The addition of the Wāhi Tūpuna mapped areas is different to undertaking works in the Wāhi Tapu or Archaeological Sites (collectively referred to as Archaeological Hazard Areas or AHAs) only in the sense that the mapped areas are on a much greater scale than defined Wāhi Tapu or Archaeological Sites and are much more focused on landscape generally, or in some instance, accessibility for the purpose of Mahika Kai. In my view, Aurora's existing processes for managing works in AHAs can be applied generally in relation to Wāhi Tūpuna areas with very little amendment. Additionally, Aurora's infrastructure does not inhibit access to waterbodies.
- 29. In 2015, Aurora obtained three global archaeological authorities from Heritage New Zealand relating to works undertaken by Aurora within the road reserve. These three authorities are due to expire in June/July 2020. With this in mind, Aurora commenced discussions with Heritage New Zealand in January 2019 to refine the existing processes.
- 30. Aurora engaged the University of Otago based Southern Pacific Archaeological Research ("SPAR") to undertake detailed research on the principles, standards, and processes for the management of archaeological sites that may be affected by maintenance and upgrade works, and to provide day-to-day operational guidance for managing those works. It is those works that are carried out on a day-to-day basis

(and which are otherwise permitted or controlled) that are the focus of this evidence.

- 31. In short, Aurora's existing and proposed enhanced processes for considering AHAs includes:
  - (a) Obtaining global archaeological authorities from Heritage New Zealand at a "catchment" level to cover maintenance and upgrade activities across the network (specific to poles, cables, transformers, link pillars and switchgear).
  - (b) Compliance with an Accidental Discovery Protocol (ADP) created in consultation with Heritage New Zealand which is engaged when earthworks are required for the works that are taking place.
  - (c) An Archaeological Sites Management Plan for each catchment to guide operations with the potential to affect archaeological sites across the network.
  - (d) Requirements for all approved contractors to be aware of ADP and any "archaeological hazard zones" which Aurora outlines in its GIS mapping software.
  - (e) Annual briefings to Aurora staff and contractors carried out by an approved archaeologist about archaeological requirements and standards including activating the ADP.
  - (f) Consultant archaeologists undertake desk-based studies where there is a risk of archaeological remains within a site or a known Wāhi Tapu site.
  - (g) Archaeological monitoring in areas determined to be high risk to ensure that correct processes for working in archaeological hazard zones are followed.
- 32. A review of these processes was already underway prior to and following notification of PDP Stage 3 and further work is ongoing in consultation with Aukaha and Kā Rūnaka representatives.

- 33. Since notification of PDP Stage 3 Aurora has been working to add to its existing processes by undertaking the following:
  - Engaging with Aukaha seeking feedback on additional processes/considerations when undertaking works specifically in Wāhi Tūpuna overlays.
  - (b) Adding the Wāhi Tūpuna overlay to Aurora's GIS mapping so that it is easily accessible to all approved contractors.
  - (c) Reviewing its training programme with approved contractors regarding works within Wāhi Tūpuna mapped areas.
- 34. In my view, these processes, combined with consultation with iwi give effect to the provisions of Chapter 5 Tangata Whenua and the objectives and policies in Chapter 39.

#### Earthworks in Wāhi Tūpuna Mapped Areas

- 35. I support the intent of Chapter 39 Wāhi Tūpuna and the associated Wāhi Tūpuna overlay as it is a useful source of information to trigger when Aurora should be aware of the possibility of engaging Aurora's Accidental Discovery Protocol and when it should be engaging with local iwi.
- 36. The approach of mapping Wāhi Tūpuna areas is consistent with the approach in the Dunedin Second Generation Plan (**2GP**) where Wāhi Tūpuna mapped areas cover a significant extent of the District, including most of Dunedin's Otago Peninsula. The key difference between the 2GP and PDP Stage 3 however is that the 2GP does not impose additional constraints on permitted activities, such as operation, repair, minor upgrading and maintenance of existing network utilities which is akin to the definition of "minor upgrading" in the PDP. An example of works to replace aging infrastructure in a Wāhi Tūpuna area is shown at **Attachment 5**.
- 37. The variation to Chapter 25 seeks to impose an additional maximum threshold on earthworks within:

- (a) Wāhi Tūpuna Mapped Areas (Rule 25.5.2).
- (b) Roads Wāhi Tūpuna areas where roads have been identified as a recognised threat to the values of the area (see Schedule 39.6) (Rule 25.5.7)
- 38. Aurora's submission was predicated on the earthworks that it undertakes being subject to maximum volume threshold limits in Chapter 25. That is indeed the impression given by Rule 30.3.3.3. In my view, if the above limits applied to all earthworks that Aurora undertook then it would be considerably constrained in terms of what it can do without resource consent given that many of the activities it could otherwise undertake in reliance of Chapter 30 are permitted.
- 39. In preparing this evidence I have reviewed the remaining rules of Chapter 25, including Rule 25.3.2.8 which provides that:

The provisions in this chapter to do not apply to the following activities in Chapter 30 Energy and Utilities:

- a. Earthworks, buildings, structures and National Grid sensitive activities undertaken within the National Grid Yard;
- b. Earthworks for the placement of underground electricity cables or lines.
- c. Earthworks for the construction, alteration, or addition to underground lines.

#### [Emphasis added]

40. The wording of Rule 25.3.2.8 is inconsistent with Aurora's general uses of the terms "cables" and "lines" which is why this had not been picked up at the time the submission was filed. In the context of electricity distribution infrastructure "cables" only relate to underground and "lines" only relate to overhead infrastructure. A "line" cannot be separated from its support structures and works on that line only require ground disturbance when a pole is being installed or replaced. To clarify the wording of this rule, without changing its substance or effect, I consider that the word "overhead" can be added before the word "lines" at (b) and the word "to" in the first line can be removed.

- 41. The effect of Rule 25.3.2.8 is that earthworks pursuant to the placement of underground electricity cables *and* overhead lines are excluded from the maximum volume thresholds as notified in Rules 25.5.2 and 25.5.7.
- 42. In my view, it is unclear whether "minor upgrading" pursuant to Rule 30.5.5.1 is included within Rule 25.3.2.8. The definition of "minor upgrading" was subject to mediation in PDP Stage 1 and the consent order recording the agreed amendments was included in my first brief of evidence for Streams 17 and 18.
- 43. Activities that on their face appear to fall outside the scope of Rule 25.3.2.8 primarily relate to the inspection, repair and upgrade of existing underground cables as these activities do not involve the placement of a new cable. For cables that are direct buried, the only way to inspect a section of cable is to dig it up. This generally involves the same level of earthworks that would be required when the cable is placed in the ground, so the effects on the environment are the same. This type of activity will easily exceed the maximum volume threshold of 10m<sup>3</sup>. In my view, it is counter-intuitive to require earthworks consent for the inspection or upgrade of an existing underground cable but not require consent for the placement of a new cable. Once the earthworks are completed, the ground surface is restored to its original state.
- To assist the commissioners in understanding the nature of adverse effects and the scale of earthworks involved I have included at Attachment 1 photographs of cables being installed and upgraded.
- 45. In my view, Aurora's relief on Chapter 25 can be refined through an amendment to Rule 25.3.2.8 as follows:

The provisions in this chapter to do not apply to the following activities in Chapter 30 Energy and Utilities:

a. Earthworks, buildings, structures and National Grid sensitive activities undertaken within the National Grid Yard;

- b. Earthworks for the placement <u>or minor upgrading</u> of underground electricity cables or <u>overhead</u> lines.
- c. Earthworks for the construction, alteration, or addition to underground lines.

[added text <u>underlined</u>, removed text strikethrough]

- 46. The words "*or minor upgrading*" have been added to (b) to explicitly remove these activities from the maximum volume thresholds in Chapter 25. It is considered that the word "overhead" can be added and the word "to" removed as a Schedule 1 Clause 16 amendment as the change will have a minor effect and corrects an error.
- 47. The evidence of Michael Bathgate outlines refinements to Kā Rūnaka's position on earthworks as follows:<sup>3</sup>
  - (a) Remove 10m<sup>3</sup> maximum volume earthworks (Rule 25.5.2) from
    Wāhi Tūpuna in Urban Environment Zones.
  - (b) Amend Rule 25.5.11 to apply the 10m<sup>3</sup> maximum volume earthworks only in relation to Wāhi Tūpuna No. 5, 9, 12, 16, 20, 22 and 27.
- 48. While I support the amendments outlined above, in my view, these refinements do not address the issue of earthworks required for the purpose of "minor upgrading" and particularly for earthworks in relation to underground cables.
- 49. The evidence of Michael Bathgate also amends Rule 25.5.11 so that the maximum earthworks threshold applies where earthworks are being undertaken within 20 metres of a waterbody. I do not support this amendment on the basis that the works that Aurora undertakes in proximity to waterways have only minor and temporary effects on the landscape and may not have any adverse effects on water quality. This is expanded in my discussion of the rules in Chapter 39.

<sup>&</sup>lt;sup>3</sup> Evidence of Michael Bathgate at Appendix 1 page 29.

#### Chapter 39 Rules

- 50. Rules 39.5.1 to 39.5.3 require that any building or structure, within a Wāhi Tūpuna overlay, where activities affecting water quality are a recognised threat within urban zones and all rural zones, shall be setback from waterbodies.
- 51. Aurora owns a minimum of 137 poles within the District which are located within 20 metres of a waterbody. I say a minimum because I have not been able to obtain the location of where a "waterbody" commences from the Council so the figures provided are an estimate based on data that I have been able to obtain. I suspect there are far more poles in proximity to waterbodies that will be affected by Rules 39.5.1 to 39.5.3. A breakdown of the pole numbers, height, date of installation and material of the pole is attached to this evidence as Attachment 2.
- 52. Of the 137 poles, 74 are located between 7 metres and 20 metres with the balance being located within 7 metres of the waterbody. Many of these poles were installed over 40+ years ago and are reaching the end of their lifecycle and need to be replaced.
- 53. Power poles are required to be located near a waterbody as they are required to cross the waterbody to provide a connection to remote areas.
- 54. An example of this is at Glenorchy where existing poles have been installed within the Rees River (Wāhi Tūpuna No. 15 Tāhuna) as shown at **Attachment 3**. This example shows two 10 metre hardwood poles (Poles 38028 and 38029) located directly within Rees River with other poles located within 20 metres of the bed of the waterbody.

#### **Definition of Structures**

55. Aurora's infrastructure broadly comes within the definition of a "structures" as defined by Chapter 2 of the PDP. The types of structures that are regularly installed by Aurora's contractors can range from very small structures such as link pillars to power poles which are typically 11 metres tall and would be caught by Rules 39.5.1 to 39.5.3. Photographs and descriptions of this infrastructure is included with this evidence at **Attachment 4**. These types of infrastructure will not be installed within

the waterbody but may be located within 20 metres of the waterbody. In my view the installation of these structures will not have an adverse effect on water quality.

- 56. Once installed, poles do not have any impact on water quality. If the pole is being installed directly within the waterbody (which is infrequent) then there may be some discharge of sediment to the waterbody as a result of earthworks. However, this sediment would be temporary and be controlled by the rules of the Otago Regional Plan. Included with this evidence at **Attachment 5** are examples of the dimensions of poles that have been installed in a Wāhi Tūpuna area on Dunedin's Otago Peninsula. While these poles have not been installed in proximity to a waterway, they provide useful guidance about the size of the pole and the scope of earthworks that would likely be required if a pole were to be installed in proximity to a waterway.
- 57. The evidence of Michael Bathgate provides an updated position on setbacks from waterbodies in urban areas and seeks to delete Rule 39.5.1. I support the addition of the Urban Wāhi Tūpuna areas and the deletion of Rule 39.5.1.
- 58. The evidence of Michael Bathgate also seeks to amend Rules 39.5.2 and 39.5.3 to remove "where activities affecting water quality are a recognised threat". I support this amendment. The term "Energy and Utilities" is a recognised threat in many of the Wāhi Tūpuna areas and even relatively small structures such as service fuse boxes, distribution pillars and 11 kV ring main units are caught by this term. It is not clear from the section 42A Report whether it was the intention of Rules 39.5.1 to 39.5.3 to encompass these structures.
- 59. I consider that it is appropriate to excluded the activities which Aurora can otherwise undertake as permitted or controlled activities pursuant to Rules 30.5.5.1 to 30.5.5.4 on the basis that the adverse effects on water quality are no more than minor and temporary in nature. Activities which are captured by the restricted discretionary rules should also consider the functional needs of Aurora's infrastructure. Having further

considered the matter of discretion sought for Rules 39.5.1 to 39.5.3 I consider that this can be refined to:

60. Discretion is restricted to:

Functional needs of <u>Electricity Subtransmission Infrastructure</u> or <u>Significant Electricity Distribution Infrastructure</u>.

#### Conclusion

61. I consider the relief in Aurora's submission is an appropriate way of giving effect to the Strategic Directions set out in Chapters 3, 5 and 6 and that its existing internal processes, regarding works in AHAs will ensure that works are undertaken in a manner that is consistent with Chapter 5 and the objectives and policies of Chapter 39.

Dated this 19<sup>th</sup> day of June 2020

#### Joanne Dowd











## Attachment 2

### Poles within 7 metres of a Waterbody

FI	D	

D	STATUS	INSTALLATION	FACILITYID	CLASS	HEIGHT	MATER	IAL
	0 In Service	1/01/1972	7/09/2000			HW	
	1 In Service	1/01/1977	24/08/1940			HW	
	2 In Service	1/01/1977				НW	Legend:
	3 In Service	1/01/1970	45328			HW	HW = Hardwood
	4 In Service	1/01/1993	48643			SW	SW = Softwood
	5 In Service	1/01/1970	54930			CONC	CONC = Concrete
	6 In Service	1/01/1974	41295			HW	STEEL = Steel
	7 In Service	1/01/1970	41553			HW	HWIB = Hard Wood Iron Bark
	8 In Service	1/01/1973	40638			CONC	
	9 In Service	1/01/1969	17705			HW	
	10 In Service	16/03/2000	39140			SW	
	11 In Service	1/01/1970	41122			HW	
	12 In Service	1/01/1960	15076			НW	
	13 In Service	1/01/1971	41551			CONC	
	14 In Service	1/01/1970	41119			HW	
	15 In Service	1/01/1970	54939			CONC	
	16 In Service	1/01/1972	36775			HW	
	17 In Service	3/11/2003	49168			HW	
	18 In Service	1/01/1990	16201		10	HW	
	19 In Service	1/01/1999	39142			HWIB	
	20 In Service	1/01/1960	33572			НW	
	21 In Service	1/01/1970	41118			HW	
	22 In Service	1/01/1975	33245			HW	
	23 In Service	1/01/1970	41552			НW	
	24 In Service	12/06/2007	46900			HW	
	25 In Service	1/01/1971	38030			HWIB	
	26 In Service	1/01/1971	38029			HWIB	
	27 In Service	1/01/1993	16938			CONC	
	28 In Service	1/01/1970	38507	ΗV	10	CONC	
	29 In Service	1/01/1992	16486	ΗV	10	SW	
	30 In Service	1/01/1970	45327	33kV	10	НW	
	31 In Service	21/11/2003	39718	ΗV	11	НW	
	32 In Service	10/08/2001	39907	HV	10	CONC	
	33 In Service	18/05/2010	50008	ΗV	12	НW	
	34 In Service	1/01/1970	16935	HV	10	HW	
	35 In Service	22/11/2001	49126	66kV	12	STEEL	
	36 In Service	22/11/2001	49125	66kV	12	STEEL	
	37 In Service	1/01/1970	16937	HV	10	HW	
	38 In Service	22/11/2001	49124	66kV	12	STEEL	
	39 In Service	1/01/1960	33571	ΗV	10	HW	
	40 In Service	1/01/1970	41130	ΗV	10	HW	
	41 In Service	1/01/1970	38553	HV	10	HWIB	
	42 In Service	1/01/1993	16939	HV	10	CONC	
	43 In Service	1/01/1967	17636	HV	10	HWIB	
	44 In Service	1/01/1990	41129	ΗV	11	SW	
	45 In Service	30/07/1993	15082	LV		HW	
	46 In Service	4/03/2010	62690	66kV	10	HW	
	47 In Service	4/03/2010	62616	66kV	14	HW	
	48 In Service	4/03/2010	41634	HV	10	CONC	

49 In Service	4/03/2011	69766 66kV	15 HW
50 In Service	4/03/2011	69767 66kV	15 HW
51 In Service	10/01/2011	69806 66kV	18 HW
52 In Service	22/02/2011	40943 HV	10 CONC
53 In Service	1/01/1971	38028 HV	10 HWIB
54 In Service	25/11/2009	54680 HV	10 CONC
55 In Service	25/05/2017	86138 HV	12.5 CONC
56 In Service	23/11/2017	95275 HV	14 STEEL
57 In Service	23/11/2017	95303 HV	11 HW
58 In Service	29/11/2017 TBA3	HV	11 CONC
59 In Service	29/11/2018	95403 HV	11 STEEL
60 In Service	10/05/2019	98274 HV	14 HW
61 In Service	10/05/2019	98275 HV	14 HW

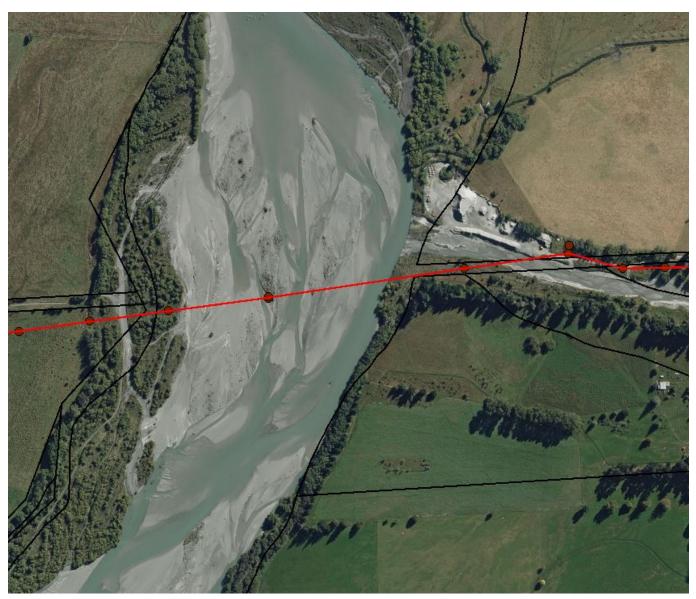
## Poles within 20 metres of a Waterbody

FID	STATUS	INSTALLATION	FACILITYID	CLASS	HEIGHT MATER	
FID	0 In Service	1/01/1970			10 HWIB	IAL
	1 In Service	1/01/1960			10 HWB	
	2 In Service	1/01/1900			10 HW	
	3 In Service	1/01/1979			10 HW	Legend:
	4 In Service					HW = Hardwood
		1/01/1972			10 CONC	SW = Softwood
	5 In Service	1/01/1972			11 HW	CONC = Concrete
	6 In Service	1/01/1977			11 HW 10 HW	STEEL = Steel
	7 In Service	1/01/1966				HWIB = Hard Wood Iron
	8 In Service	1/01/1960			10 HWIB	Bark
	9 In Service	1/01/1965			10 HW	
	10 In Service	1/01/1977			11 HW	
	11 In Service	1/01/1960			10 HWIB	
	12 In Service	1/01/1966			10 HW	
	13 In Service	1/01/1970			10 HW	
	14 In Service	1/01/1993			11 SW	
	15 In Service	5/03/2008			11 HW	
	16 In Service	1/01/1990			10 HW	
	17 In Service	1/01/1985			10 SW	
	18 In Service	1/01/1960			9 HW	
	19 In Service	1/01/1970	54930		10 CONC	
	20 In Service	1/01/1974			10 HW	
	21 In Service	1/01/1960	34917		9 HWIB	
	22 In Service	1/01/1970	41553		10 HW	
	23 In Service	1/01/1974	80037	HV	10 HWIB	
	24 In Service	1/01/1970			10 HWIB	
	25 In Service	1/01/1973			10 CONC	
	26 In Service	1/01/1972	36778	33kV	11 HW	
	27 In Service	1/01/1990	13427	HV	10 HW	
	28 In Service	1/01/1969	17705	HV	10 HW	
	29 In Service	1/01/1972	37520	HV	10 HW	
	30 In Service	16/03/2000	39140	HV	10 SW	
	31 In Service	1/01/1979	15396	STLT	9 SW	
	32 In Service	1/01/1970	41122	HV	10 HW	
	33 In Service	1/01/1976	37483	HV	10 HW	
	34 In Service	1/01/1960	15076	HV	10 HW	
	35 In Service	1/01/1973	40572	HV	10 HWIB	
	36 In Service	1/01/1970	41565	HV	10 HW	
	37 In Service	1/01/1971	41551	HV	10 CONC	
	38 In Service	1/01/1970	41119	HV	10 HW	
	39 In Service	1/01/1970	54939	HV	10 CONC	
	40 In Service	1/01/1972	36775	33kV	11 HW	
	41 In Service	1/01/1979	15521	STLT	9 SW	
	42 In Service	1/01/1972	40960	HV	10 HWIB	
	43 In Service	3/11/2003	49168	LV	HW	
	44 In Service	1/01/1990	16201	HV	10 HW	
	45 In Service	1/01/1999	39142	HV	10 HWIB	
	46 In Service	1/01/1979	15524	STLT	9 SW	
	47 In Service	1/01/1966	41154	HV	10 HW	
	48 In Service	1/01/1960	33572	HV	12 HW	

49 In Service	1/01/1970	30988 HV	10 HW
50 In Service	1/01/1970	41118 HV	10 HW
51 In Service	1/01/1975	33245 HV	10 HW
52 In Service	1/01/1966	41155 HV	10 CONC
53 In Service	1/01/1970	41552 HV	10 HW
54 In Service	1/01/1966	41003 HV	10 HW
55 In Service	12/06/2007	46900 HV	10 HW
56 In Service	1/01/1990	16200 HV	10 HW
57 In Service	1/01/1971	38030 HV	10 HWIB
58 In Service	1/01/1971	41555 HV	10 HW
59 In Service	1/01/1971	38029 HV	10 HWIB
60 In Service	1/01/1960	15081 HV	10 HW
61 In Service	1/01/1993	16938 HV	10 CONC
62 In Service	1/01/1960	80063 HV	10 HW
63 In Service	1/01/1970	38507 HV	10 CONC
64 In Service	1/01/1979	37710 HV	10 HWIB
65 In Service	1/01/1992	16486 HV	10 SW
66 In Service	1/01/1970	45327 33kV	10 HW
67 In Service	21/11/2003	39718 HV	11 HW
68 In Service	10/08/2001	39907 HV	10 CONC
69 In Service	1/01/1966	41158 HV	10 HW
70 In Service	1/01/1973	16485 HV	10 HW
71 In Service	1/01/1970	16933 HV	10 HW
72 In Service	17/08/2007	22035 LV	10 CONC
73 In Service	1/01/1979	33170 STLT	9 SW
74 In Service	18/05/2010	50008 HV	12 HW
75 In Service	1/01/1970	16935 HV	10 HW
76 In Service	1/01/1960	15089 HV	10 HW
77 In Service	22/11/2001	49126 66kV	12 STEEL
78 In Service	22/11/2001	49125 66kV	12 STEEL
79 In Service	1/01/1970	16937 HV	10 HW
80 In Service	1/01/1970	34229 HV	10 HWIB
81 In Service	1/01/1970	16481 HV	10 HW
82 In Service	1/01/1975	33679 HV	10 CONC
83 In Service	1/01/1970	38506 HV	10 HWIB
84 In Service	1/01/1980	38395 HV	9 HW
85 In Service	1/01/1970	40682 HV	10 HW
86 In Service	1/01/1960	38327 HV	10 HW
87 In Service	22/11/2001	49124 66kV	12 STEEL
88 In Service	1/01/1960	33571 HV	10 HW
89 In Service	1/01/1974	40228 HV	10 HWIB
90 In Service	1/01/1997	38692 HV	11 SW
91 In Service	1/01/1970	41130 HV	10 HW
92 In Service	1/01/1970	38553 HV	10 HWIB
93 In Service	1/01/1966	41002 HV	10 HW
94 In Service	1/01/1993	16939 HV	10 CONC
95 In Service	1/01/1967	17636 HV	10 HWIB
96 In Service	1/01/1973	40571 HV	10 HWIB
97 In Service	1/01/1990	41129 HV	11 SW
98 In Service	1/01/1997	41494 HV	10 SW

99 In Service	1/01/1965	41911	33kV	10	HW
100 In Service	30/07/1993	15082	LV		HW
101 In Service	24/07/2009	51265	HV	10	CONC
102 In Service	21/07/2009	50083	LV	9	HW
103 In Service	1/12/2009	54907	HV	11	HW
104 In Service	1/12/2009	54906	HV	11	HW
105 In Service	1/01/1980	38396	HV	9	HW
106 In Service	4/03/2010	62690	66kV	10	HW
107 In Service	4/03/2010	62614	66kV	14	HW
108 In Service	4/03/2010	62615	66kV	14	HW
109 In Service	4/03/2010	62616	66kV	14	HW
110 In Service	4/03/2010	62617	66kV	14	HW
111 In Service	4/03/2010	41634	HV	10	CONC
112 In Service	4/03/2011	69766	66kV	15	HW
113 In Service	4/03/2011	69767	66kV	15	HW
114 In Service	10/01/2011	69806	66kV	18	HW
115 In Service	22/02/2011	40943	HV		CONC
116 In Service	22/02/2011	69819	HV	12	HW
117 In Service	26/10/2010	69890	66kV	14	HW
118 In Service	26/10/2010	69898	66kV	15	HW
119 In Service	1/01/1971	38028	HV	10	HWIB
120 In Service	25/11/2009	54680	HV		CONC
121 In Service	1/10/1991	49190	LV	10	SW
122 In Service	2/09/2015	85577	HV		CONC
123 In Service	25/05/2017	86138	HV	12.5	CONC
124 In Service	13/06/2017	79902			UNKWN
125 In Service	31/08/2017	86146		12.5	CONC
126 In Service	2/11/1992 Pol	e 19	LV		UNKWN
127 In Service	23/11/2017	95275			STEEL
128 In Service	23/11/2017	95303	HV		HW
129 In Service	29/11/2017 TBA	43	HV	11	CONC
130 In Service	20/12/2017	95224			CONC
131 In Service	29/11/2018	95403	HV		STEEL
132 In Service	30/01/2018	95173			CONC
133 In Service	10/05/2019	98274			HW
134 In Service	10/05/2019	98275			HW
135 In Service	18/10/2019	95046	LV	11	HW

### Attachment 3



Map showing Rees River with Aurora Infrastructure Overlay

#### Legend:

- Solid Red Line: Overhead Line Pole
- Dot:
- Solid Black Line: Cadastral Boundary •

### Attachment 4

#### AURORA ELECTRICITY CABINET TYPES

Ground mounted cabinets are required in areas with underground electricity distribution.

Cabinets act as locations where the underground cables are brought to an accessible point above ground, to provide connection points to fuses, switches and transformers.

The types of cabinets that are used on the Aurora network include the following:

#### SERVICE FUSE BOX

A service fuse box is a small black or green pillar outside a residential property that holds the main low voltage fuses protecting that property.

One service fuse box usually holds fuses for the two nearest properties, but could in some circumstances hold more fuses, for example where infill subdivision has taken place.

A typical footprint for a service fuse box is 0.1m<sup>2</sup>, with a height of up to 0.5m above ground level.



Figure 1: Typical Service Fuse Box

#### LOW VOLTAGE DISTRIBUTION PILLAR

A distribution pillar is a larger box that hold switches and fuses for controlling the low voltage cables running in the street.

Pillars allow the network operator to isolate short sections of cable in the event of a fault instead of isolating the entire circuit, minimising the number of customers affected by the outage.

The footprint of the pillar depends on the number of circuits it controls, but will typically range from 0.2m<sup>2</sup> to 0.4m<sup>2</sup>, with a height of up to 1.1m above ground level.



Figure 2: Typical Distribution Pillar

#### **11kV RING MAIN UNIT**

An 11kV ring main unit fulfils the same operational function in the 11kV network as a distribution pillar does at low voltage.

The ring main unit will include fuses for protecting any transformers connected to it, and switches to control the 11kV cables in the street.

A typical footprint for an 11kV ring main unit is 0.85m<sup>2</sup>, with a height of up to 1.4m above ground level.



Figure 3: Typical 11kV Ring Main Unit

#### DISTRIBUTION TRANSFORMER

Distribution transformers convert the 11kV supply to low voltage suitable for distributing to customers.

The low voltage network is usually capable of allowing a transformer to supply customers within a radius of approximately 300m.

Distribution transformers are available in a range of power capacities, measured in kiloVolt-Amps (kVA), with the appropriate capacity depending on the number and type of customers being supplied.

A common transformer size is 300kVA, which is suitable for supplying approximately 100 residential customers.

Larger transformers can supply greater numbers of customers, but the 300m radius limit remains relatively constant.



Figure 4: Typical 300kVA Distribution Transformer

The degree to which the physical size of a transformer can be reduced is limited by the requirement for it to contain oil.

The oil acts as both electrical insulation and as coolant, and there will be a minimum volume of oil that this necessary to do this.

Depending on its capacity, distribution transformer footprints range from 1.0m<sup>2</sup> from the smallest 15kVA units to 3.4m<sup>2</sup> for large 1000kVA units, with 2.2m<sup>2</sup> being a typical footprint for a 300kVA transformer. The transformer cabinet height is up to 1.5m above ground level.

In order to fulfil its function, each distribution transformer requires an 11kV ring main unit that incorporates the fuses that protect the transformer, and a low voltage distribution pillar to control the cable circuits leaving the transformer.

The low voltage distribution pillar is incorporated into one end of the transformer cabinet, but there is insufficient space in the cabinet to house an 11kV ring main unit, requiring it to be housed in a separate cabinet.



Figure 5: 300kVA Distribution Transformer with Adjacent Ring Main Unit

#### **COMPACT SUBSTATION**

A compact substation, also known as a berm substation, incorporates an 11kV switch, a distribution transformer and a low voltage distribution pillar into a single cabinet, in order to reduce the number of cabinets required.

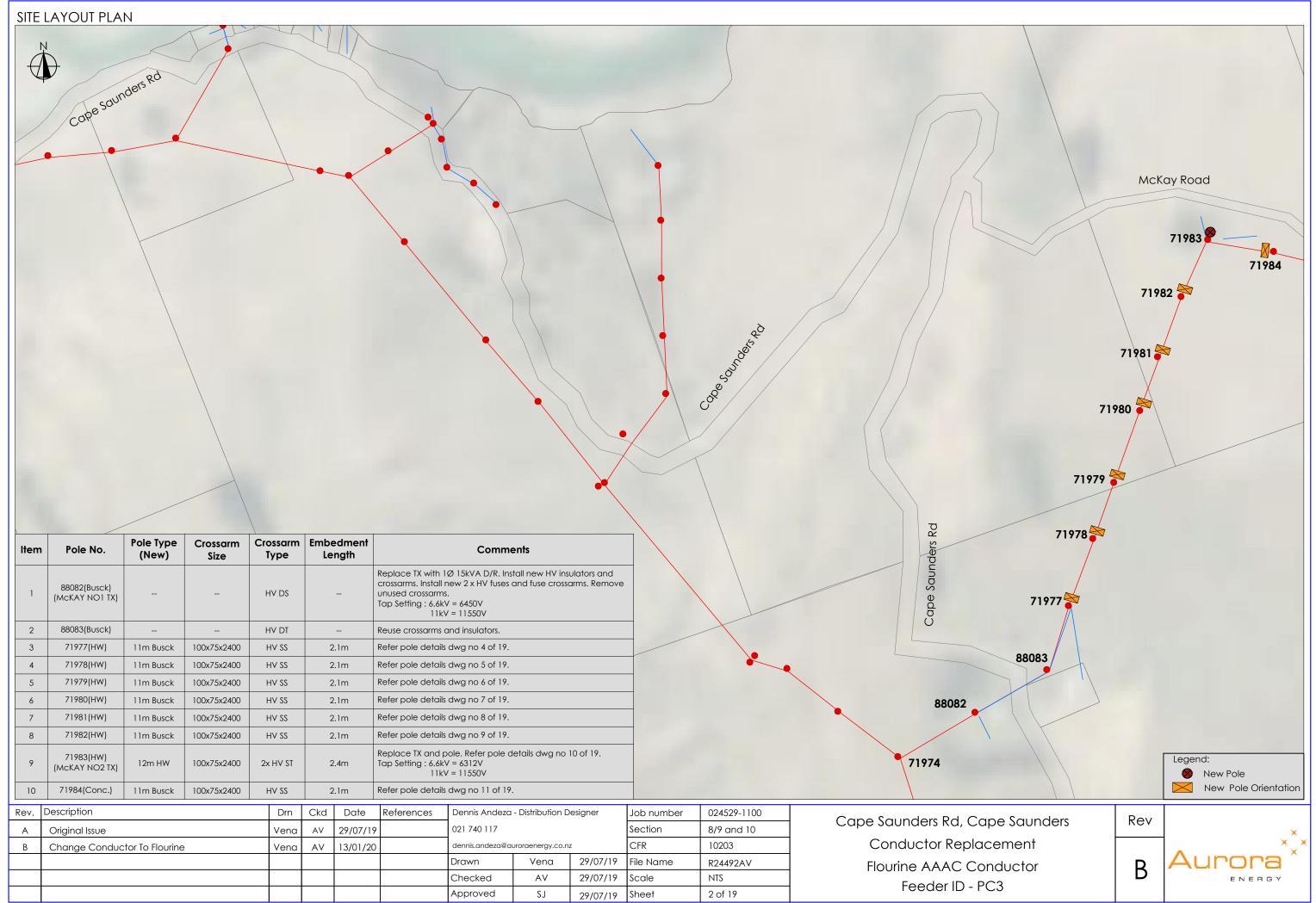
Compact substations are larger than standalone transformers, due to the additional space required to house a ring main unit inside the same cabinet as the transformer.

A typical compact substation has a footprint of between 3.0m<sup>2</sup> and 4.6m<sup>2</sup>, with a height of up to 1.5m above ground level.

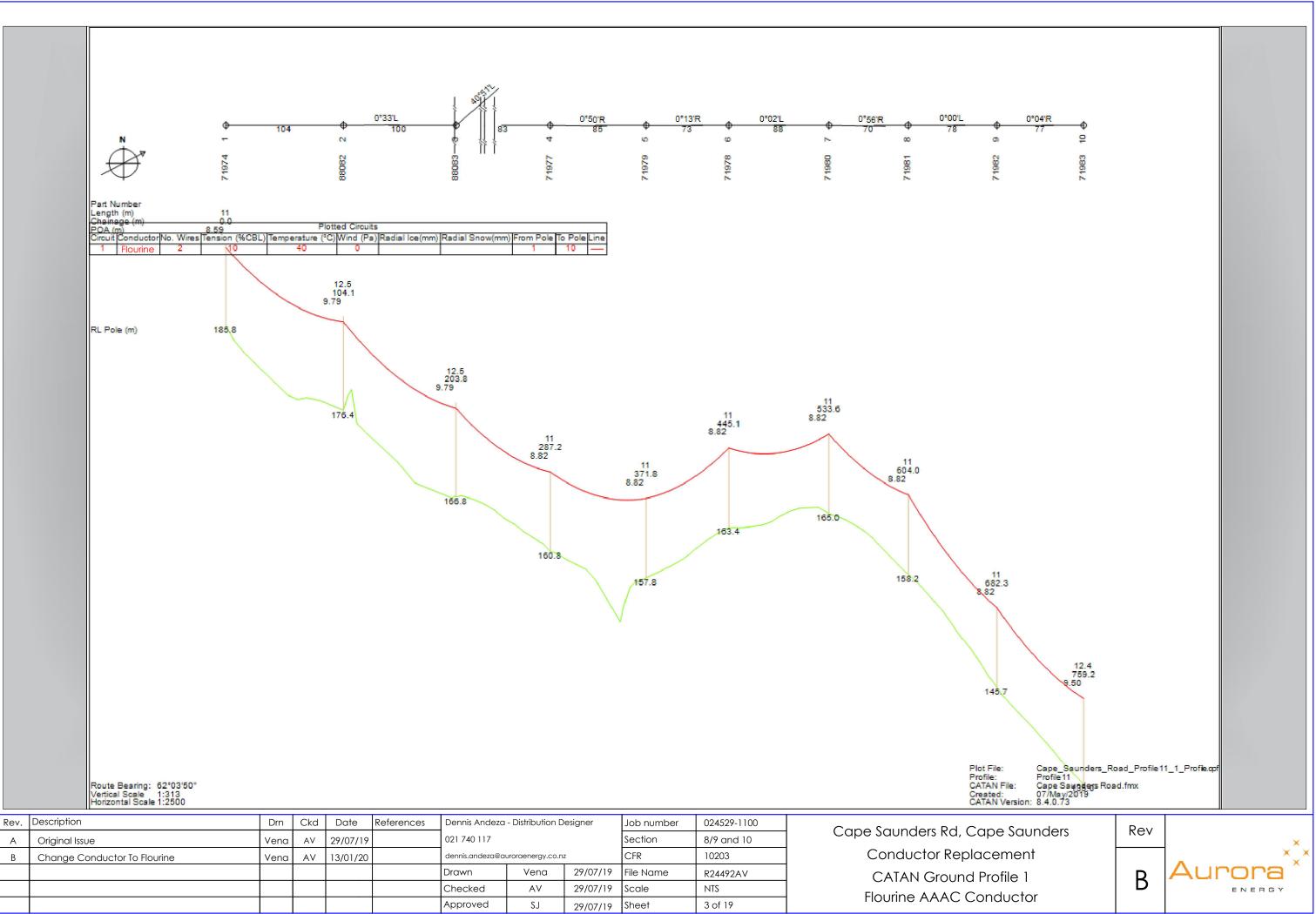


Figure 6: Typical Compact Substation incorporating Transformer and Ring Main Unit

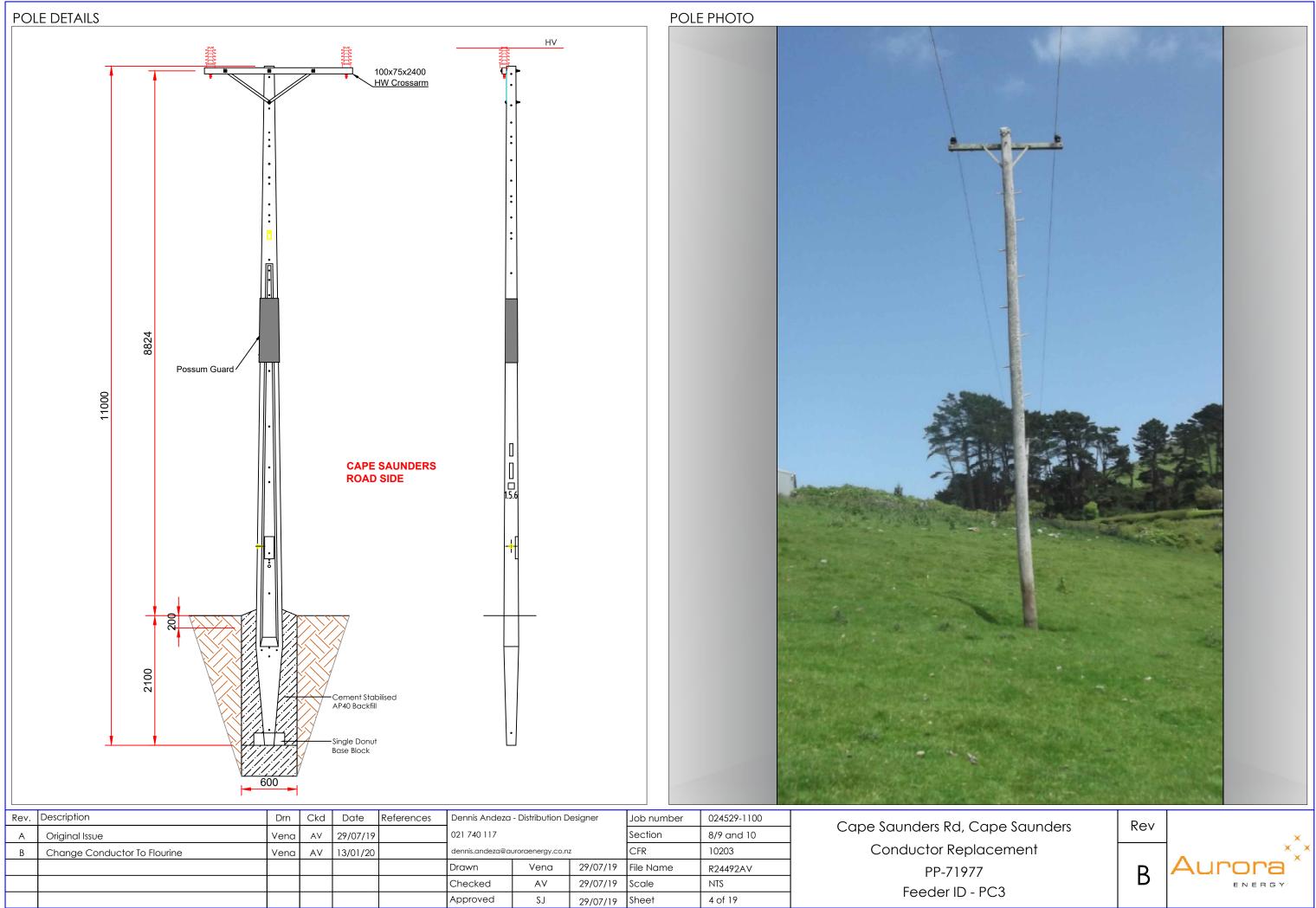
### Attachment 5



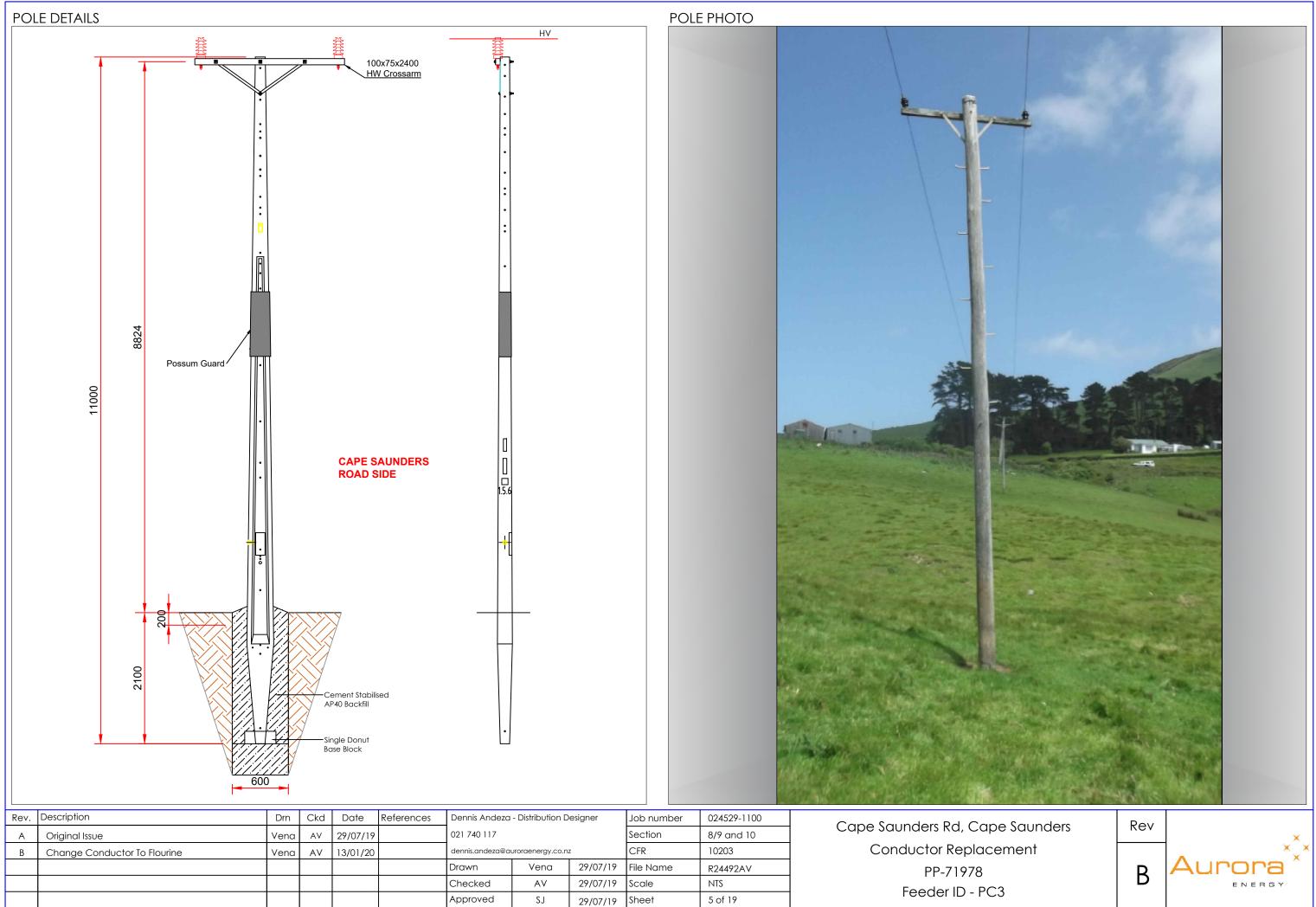
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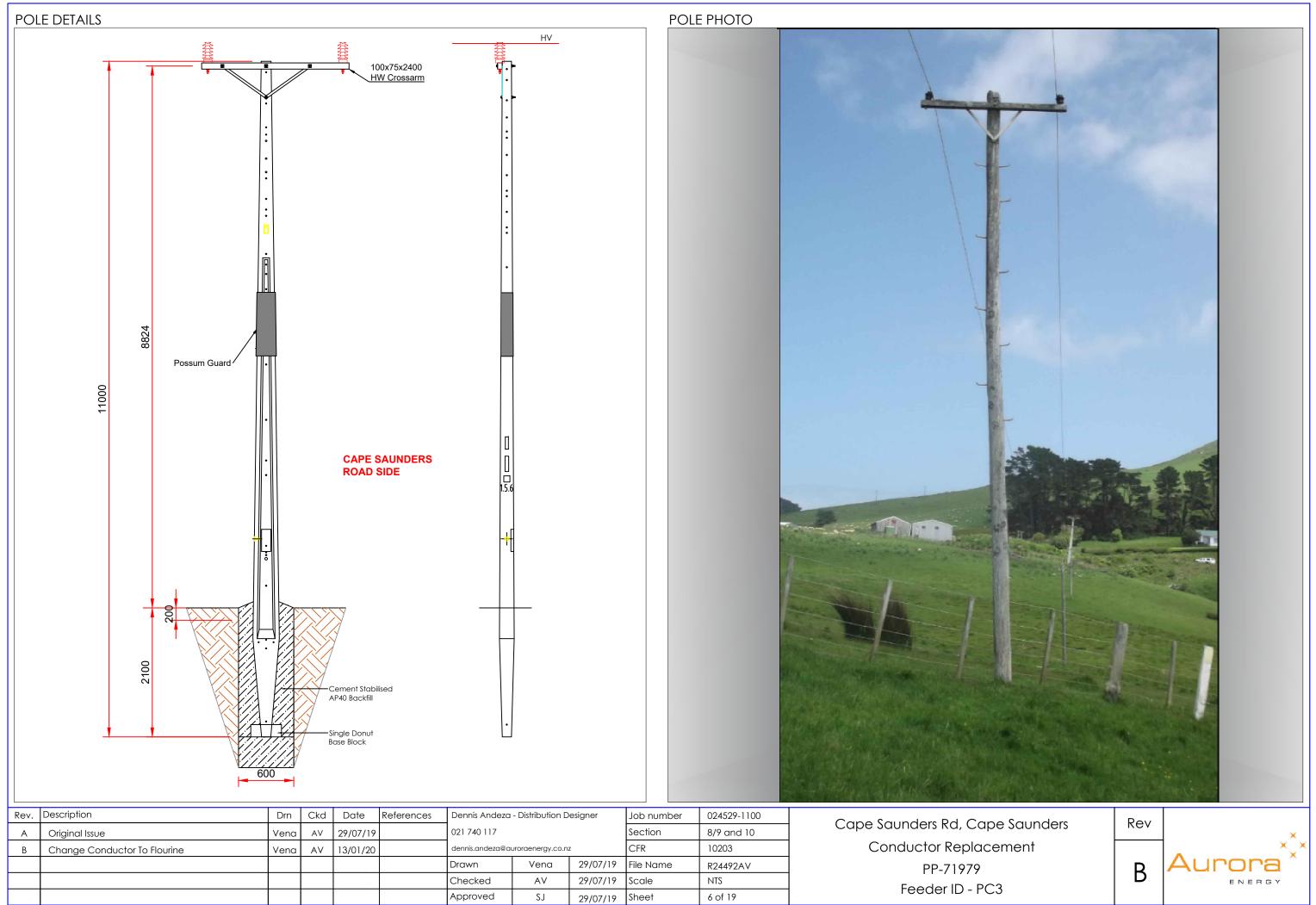


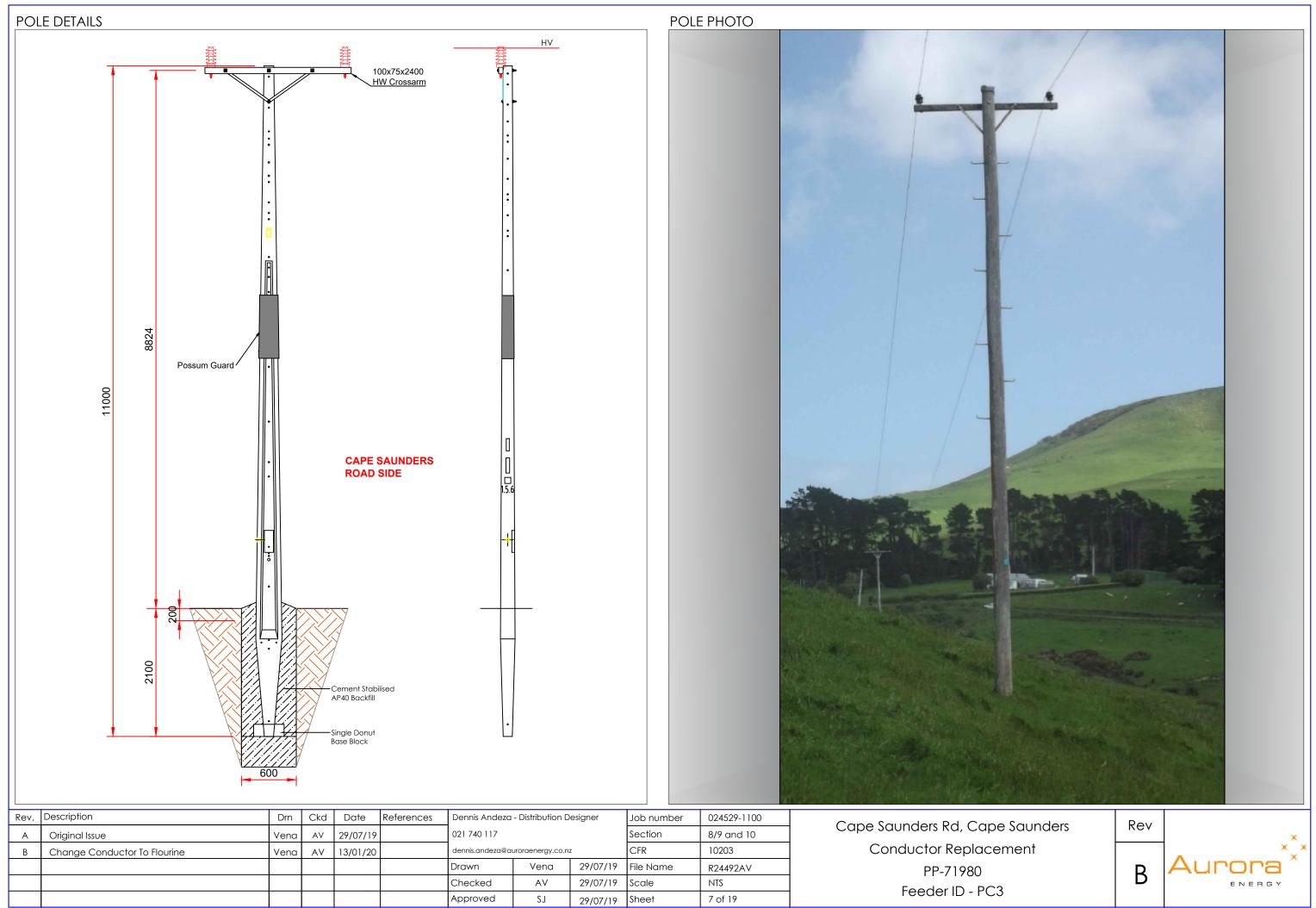
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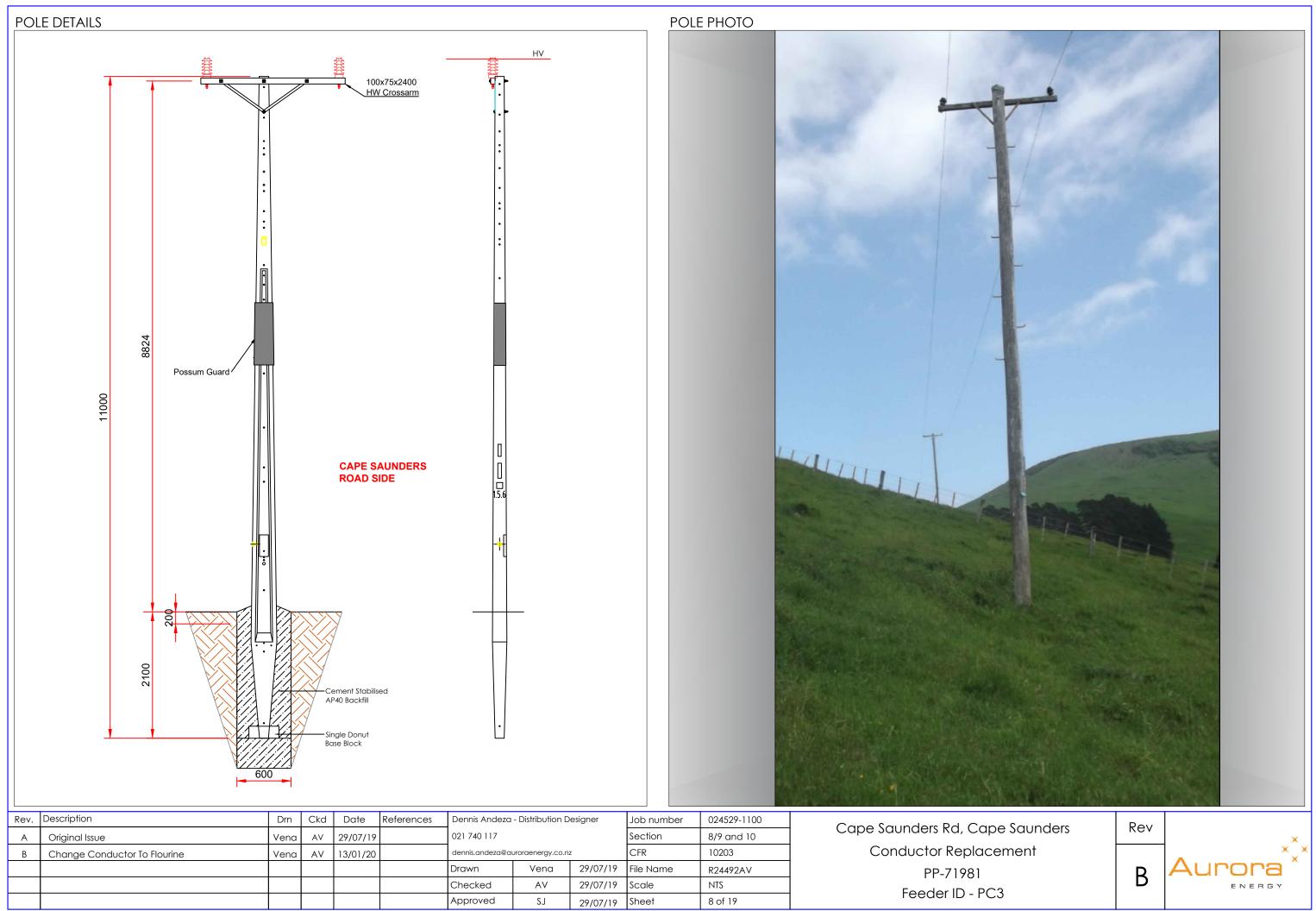


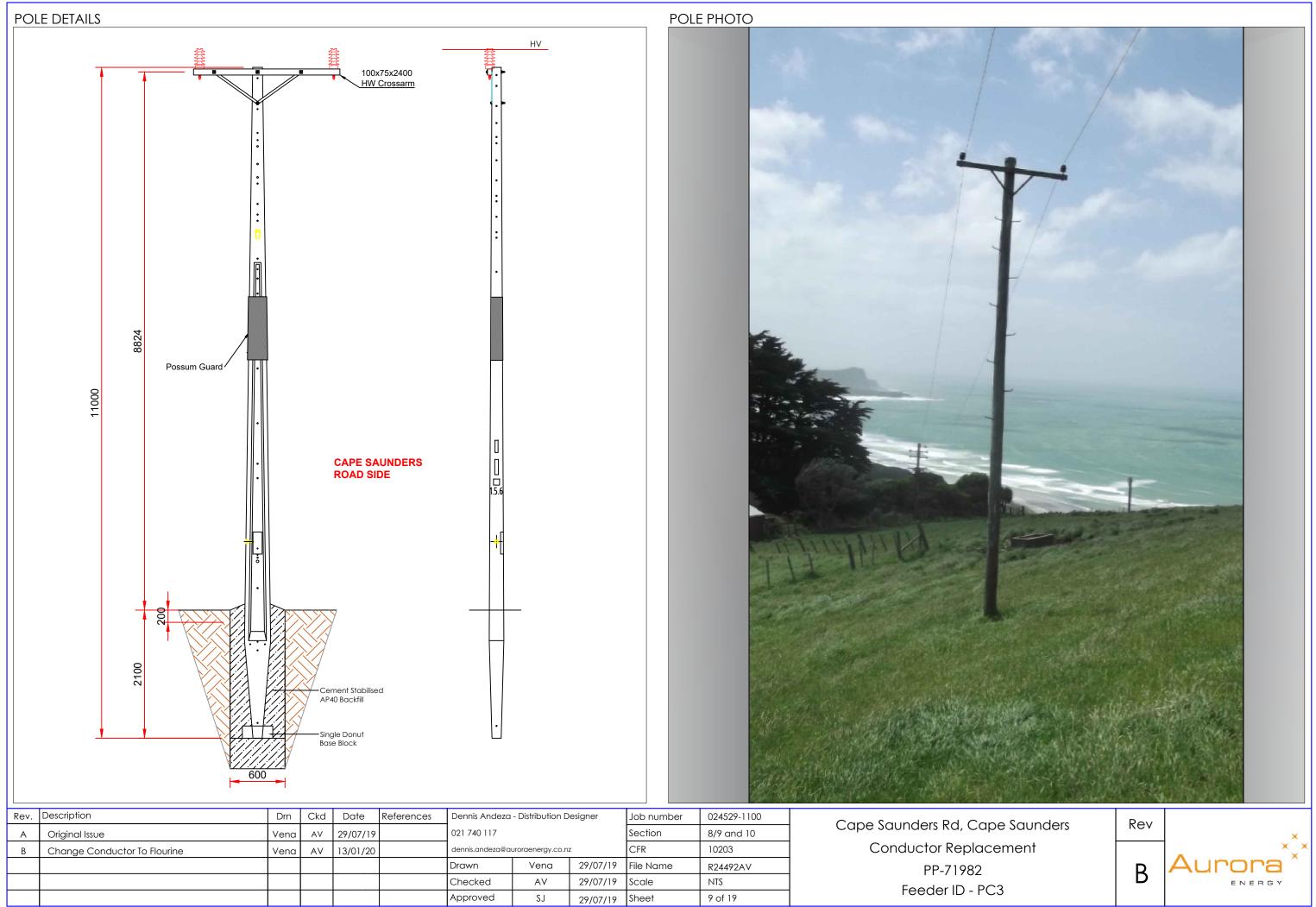
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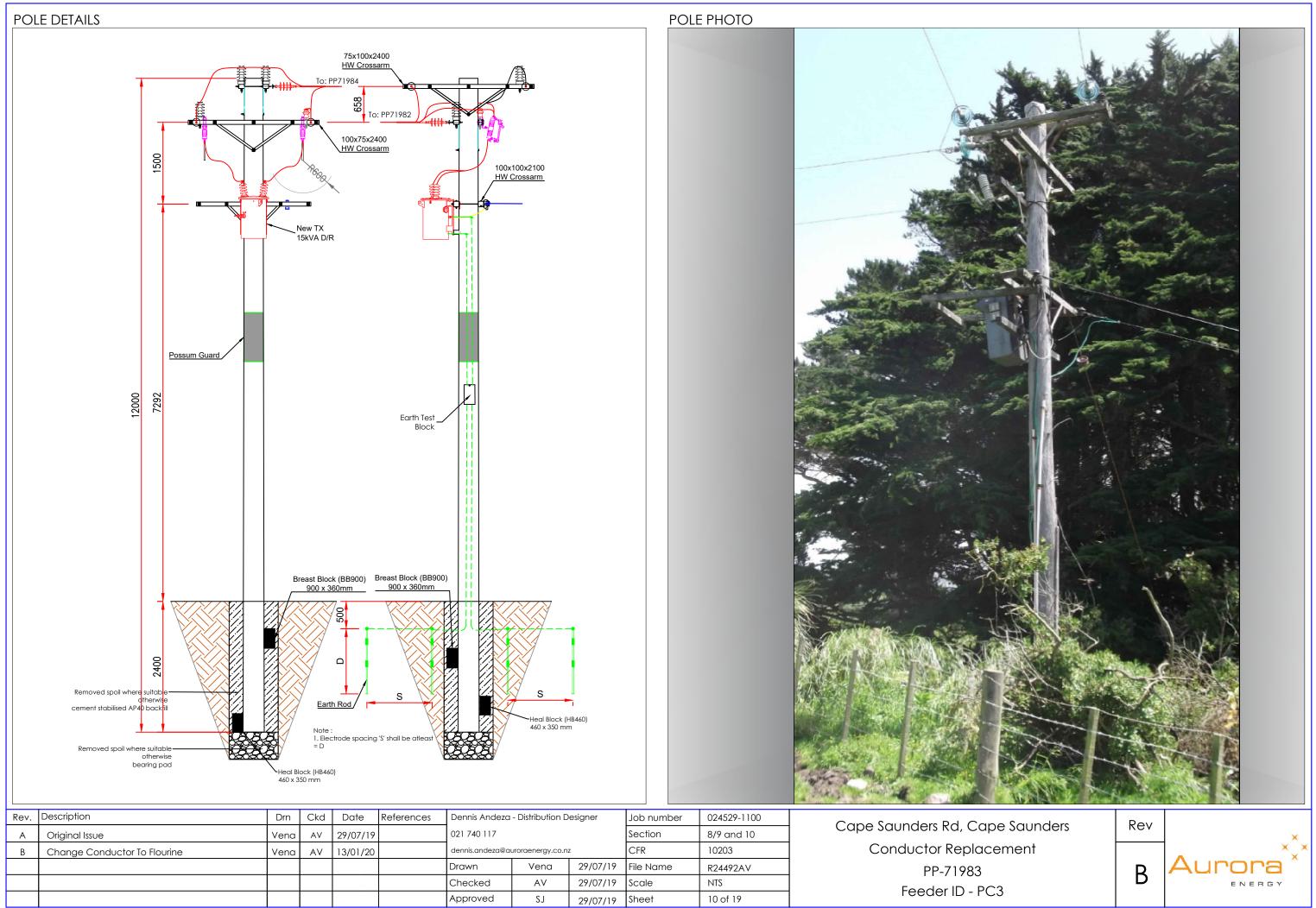












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