

2 September 2016



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Dear Megan,

RE: Request for Comment - Glendell Mine Modification 3 (DA 80/952 MOD3)

Ausgrid acknowledges the receipt of your request for comment for the above modification provided on the 17th August 2016 and welcomes the opportunity to provide comment on this modification. We recognise Ausgrid is a key stakeholder in the development of this relocation, particularly as it will be the end owner of the proposed line. Ausgrid has reviewed DA 80/952 MOD and would like to provide the following feedback on the application. In developing this feedback, Ausgrid has considered the level of detail normally provided with regards to its self-approving responsibility under Part 5 of the EP&A Act. Ausgrid recognises that this has been carried out for comparison purposes only and does not form part of any approval for this modification.

Asset Ownership, Operation and Maintenance

Ausgrid would like to indicate that the proposed 132kV relocation will, on completion of the proposed works, become an Ausgrid asset. As such construction, operation and maintenance of this line will be carried out under the Electricity Supply Act. This document does not appear to have been referenced in the modification documentation.

We also note that Ausgrid's ongoing arrangements for operations and maintenance, which have not developed under the state significant approval will also be utilised for the proposed line. While Ausgrid believe their ongoing maintenance and operational practices will be consistent with the intent of the environmental approvals for the site, it has not carried out any detailed assessment in this regard. We suggest that consideration of this in the approval of this modification may be required (subject to the Department of Planning's assessment of the modification).

Environmental and Ecological review

Ausgrid's review of the environmental arrangements proposed in the modification indicates that there appears to be a deficiency in the level of detail provided in the assessment in comparison to an environmental approval Ausgrid would carry out under its self-approving arrangements. We identify that potentially additional information may have been made available in the original mine approval and that this remains within the Department of Planning and Environment's scope of approval. However Ausgrid has the following comments:

1. The 132kV relocation is identified as being within the approval boundary but outside the disturbance boundary for the mine's approval. We note that this has been identified and would suggest some clarification on the impact this has on the environmental arrangements, assessments and approvals is included in the documentation.

2. The use and impact of access tracks for the modification appears to lack detail. We note that the proposed access arrangements provided to Ausgrid in the proposed design (sheet 19), include access to poles being through the 132kV easement for the majority of the route. This appears to include access through swamp creek. As Ausgrid requires the access tracks to provide 24/7 all-weather access to the proposed poles, it is assumed that additional access works through swamp creek will be required but do not appear to have been assessed. Ausgrid intends under operations and maintenance conditions to only access these poles via rights of way and easements established as a part of the proposed project.
3. We note that the assessment indicates the selected location of poles is a "substantial" distance from the Bowman and Swamp Creek areas (section 4.3.2) although this distance is not defined. Poles 1, 2, 3 and 10 on the route appear to be in close proximity to Bowman's and Swamp Creek. Ausgrid suggests additional detail may be required to confirm this still meets the definition of a substantial distance from these areas and that these poles will not affect sensitive areas along the route.
4. Section 4.4.2 of the modification indicates that access tracks works will be carried out in accordance with *NS174 Environmental Handbook for Construction and Maintenance*. We note that NS174 has been developed for Ausgrid specific projects carried out under Ausgrid's environmental self-approval arrangements. Ausgrid provides no warranty that this documentation will be consistent with the overall state significant mining approval and subsequent environmental compliance. We also note that this document has not been provided by Ausgrid to form part of the modification approval and may potentially be changed by Ausgrid over the life of this project. We recommend that project environmental controls for this project do not utilise this document but are site specific and consistent with the overall state significant approval.
5. We note that there are a number of statements throughout the modification relating to the suitability of the route and construction arrangements from an ecological perspective. As no detailed ecological assessment has been provided as part of the modification submission, we note that this cannot be confirmed. Ausgrid suggests that a detailed ecological assessment be included within the modification documents. Without this, there is a concern that there is a lack of assessment of the impacts on possible threatened species and overall sensitive features such a Swamp and Bowman creeks.

Thank you for the opportunity to comment on the proposed DA 80/952 modification. Please contact me via email or via my direct number (02 9394 6659) should you wish to discuss Ausgrid's comments further.

Regards,



James Hart

Manager – Environmental Services

Network Services

Ausgrid