

14 February 2022

Director – Energy Assessments, Planning and Assessment,
Department of Planning and Environment,
Locked Bag 5022, Parramatta NSW 2124.

Dear Sir/Madam,

**RE: Project Energy Connect (NSW Eastern Section)
Application SSI-9172452**

Thank you for the invitation to comment on the EIS providing detailed assessment of the above proposed infrastructure project.

APA has no objection subject to conditions.

I understand Transgrid are cognisant of our asset and have engaged our Infrastructure Protection staff in discussions on the crossing of our asset.

APA's Role

As a pipeline Licensee, APA is required to operate pipelines in a manner that minimises adverse environmental impacts and protects the public from health and safety risks resulting from operation of our high pressure gas transmission pipelines (**HPGTP**). Once a HPGTP is in place, APA is required to constantly monitor both the pipeline corridor and also a broader area within which we are required to consider land use changes and development and to assess what such changes means to the risk profile of the HPGTP.

APA has a number of responsibilities and duties to perform under a complex framework of legislation, standards and controls across Federal, State and Local Government landscapes. In particular, the Australian Standard 2885 (**AS2885**) sets out mandatory safety standard for the design, construction, operation and maintenance of transmission pipelines. In discharging our regulative responsibilities, APA needs to continuously review what is happening around its assets, what land use changes are occurring and what development is taking place to ensure it remains in a position to comply with applicable operational and safety standards and legislation whilst meeting its commercial obligations and imperatives.

Easement and Pipeline Management

The proposed above ground high voltage electricity transmission project crosses APA's Bomen – Culcairn Pipeline west of Wagga Wagga. This pipeline is a 450mm diameter buried steel pipeline constructed in 1998. Please see Image 1 below.

This buried high pressure natural gas transmission pipeline forms part of the broader East Coast Grid which ultimately provides an integrated transmission network servicing Queensland, Northern Territory New South Wales, Victoria and South Australia and is critical to the economic and social wellbeing of of Australia.

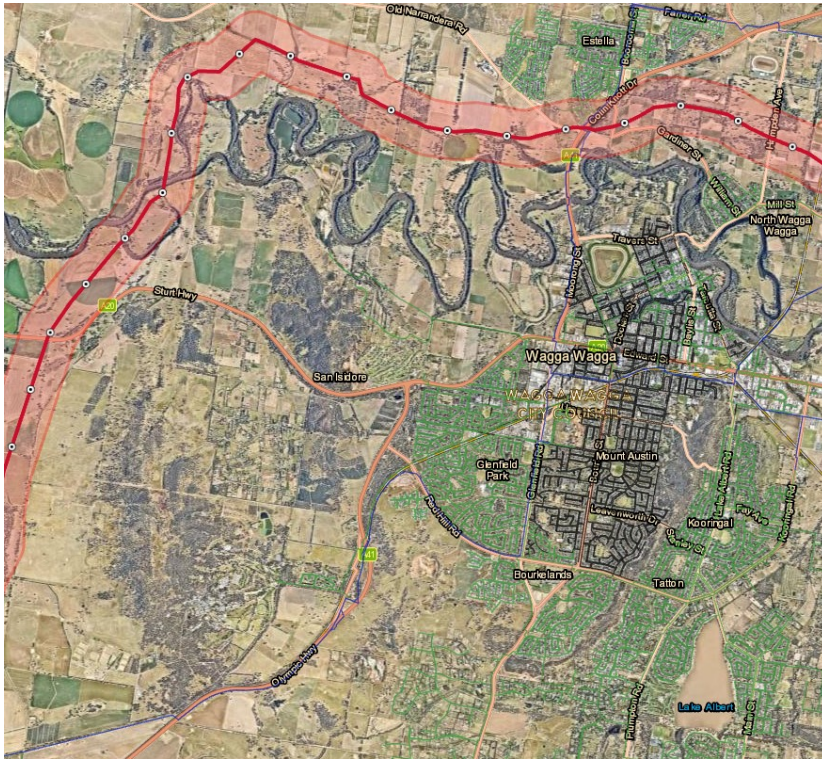


Image 1: Bowmen-Culcairn Pipeline and Wagga Wagga

Crossing of high pressure gas assets needs to be carefully managed. In the case of the proposed infrastructure project, two main risks are identified being:

1. Induced electrical current; and
2. Direct threat during construction

Induced Current

Notwithstanding the transmission pipeline is below ground, the proximity of high voltage power lines gives rise to the potential for electrical current to be transferred to the steel pipeline presenting a significant risk to APA personnel operating directly on the pipeline and associated equipment.

To better understand, mitigate and manage this risk, an induced current study will need to be undertaken and any mitigation measures and management protocols put in place. This process is the responsibility of the proponent to run and implement.

Comments

On the basis of the information provided, APA does not object to the proposed development subject to the following conditions being included with any approval issued for the proposal:

Conditions of Approval

1. Induced current risk assessment

Prior to any works traversing the transmission pipeline easement, including above ground electricity transmission lines, the proponent must undertake an induced electrical current risk assessment identifying potential risks to the APA pipeline including any physical mitigation measures and ongoing management requirements. The cost of the assessment/study and the implementation of any risk management outcomes are to be borne by the proponent.

2. Third Party Works Authorisation

Prior to the commencement of any works within the transmission pipeline easement the proponent must enter a Third Party Works Authorisation with APA Group. Works within the easement must comply with any conditions attached to a Third Party Works Authorisation.

Note

If you are planning on undertaking any physical works on property containing or proximate to a pipeline, or are seeking details on the physical location of a pipeline, please contact Dial Before you Dig on 1100 or <https://www.1100.com.au/>, or APA directly on APApotection@apa.com.au.

Note

An early works agreement from APA is required for any assessments/approvals that require greater than 3 days assessment or supervision. Lead in times for agreements can be up to 12 weeks. Please contact APA at APApotection@apa.com.au or 1800 103 452.

Note

Any improvements within the transmission pipeline easement undertaken by third parties is at the risk of the proponent who will remain liable. APA will not be liable for any costs associated with the reinstatement of any vegetation and/or infrastructure constructed on the easement.

For any further enquiries relating to this correspondence, please feel free to contact myself on 0472845967 or the Infrastructure Planning & Approvals team at planningnsw@apa.com.au.

Yours faithfully,



Phillip McCutcheon
Manager – Urban Planning
Infrastructure Planning and Approvals