

**BEFORE A BOARD OF INQUIRY
EAST WEST LINK PROJECT**

UNDER

the Resource Management Act 1991

And

IN THE MATTER

Notices of requirement for designation
and resource consent applications by
the NEW ZEALAND TRANSPORT
AGENCY for the East West Link Project

**SUMMARY OF EVIDENCE OF HYWEL DAVID EDWARDS FOR FIRST GAS LIMITED
(FIRST GAS SUBMISSION 126342)**

21 August 2017

SUMMARY OF EVIDENCE

1. I am an Associate Planner with Beca Limited and am providing planning evidence on behalf of First Gas Ltd ("First Gas"). I am qualified to give expert opinions on planning and condition matters raised in the First Gas submission.
2. First Gas's asset within the East West Link ("Project") Project area – the East Tamaki to Taupaki Gas Pipeline (and ancillary infrastructure) - is designated in the Auckland Unitary Plan¹. It provides significant economic and social benefits to the Auckland region.
3. First Gas neither supports nor opposes the Project as notified, but has applied what I would described as a constructive approach to the potential relocation of its asset.
4. In the event the Project approvals as sought are granted, First Gas's submission sought that the condition framework both:
 - (a) enable the operation, maintenance, repair and upgrade of First Gas' asset both during construction and the longer term; and,
 - (b) protect First Gas' asset from others' activities both during construction and in the longer term.
5. My Evidence in Chief² commented on the proposed condition framework as recommended in the evidence of Ms Lesley Hopkins on behalf of the Transport Agency. Ms Hopkins' recommended amendments to NU.1 (NoR 1 and NoR 2) and NU.5 (NoR 1) sought to address the points made in First Gas' submission.
6. While noting that First Gas is a primary designation holder and the constructive working relationship between First Gas and the Transport Agency, I deemed those conditions to be appropriate. My opinion was that the recommended conditions would provide an appropriate framework for the continued involvement of First Gas during the detailed design phase of the Project, as that involvement relates to the gas network.
7. No corrections are required to my evidence, and it remains true and correct to the best of my knowledge and belief.

MATTERS ARISING POST EVIDENCE EXCHANGE

8. Since evidence exchange, I am aware that meetings have continued to occur between First Gas and representatives for the Transport Agency. I am also aware of discussions having occurred between representatives of First Gas and Mercury NZ Ltd. These meetings have largely related to the relocation of First Gas assets currently located within the Southdown Site.

¹ Designation Reference 9102 which has been given effect to.

² Dated 10 May 2016, paragraph 32 onwards.

9. From my recent discussions with Mr Adam Du Fall (First Gas Land and Planning Manager) and Mr David Innes (First Gas Transmission Engineering Manager), I understand First Gas' current position on the Project is that:
- (a) the Project alignment poses a number of risks to and from First Gas' assets on the Southdown Site, and therefore relocation is required;
 - (b) the gas supply infrastructure must remain connected to the Southdown Site to retain First Gas' ability to supply gas to potential users;
 - (c) the relocated assets are not specifically required to be accommodated within the confines of the existing Southdown Site ('connection' is required however);
 - (d) A range of sites continue to be investigated (via a specialist consultant contracted by First Gas) to accommodate relocated assets; and
 - (e) First Gas will not accept a situation where it is 'worse off'. By this, I mean that:
 - (i) a suitable site(s) for the relocated asset is found and any necessary approvals to enable that relocation are secured;
 - (ii) that all costs associated with asset relocation will be borne by the Transport Agency; and,
 - (iii) the ability to supply gas to potential users at the Southdown Site is not compromised.
10. I have attached a letter from First Gas' Land and Planning Manager dated 18 August 2017 which confirms many of the above points.
11. I am aware that various facilitated meetings and expert conferencing has been held in respect of the Southdown Site. I have not personally attended those meetings, and to the best of my knowledge nor has any representative of First Gas.
12. I have reviewed the joint witness statement produced following expert planning (conditions) conferencing between Ms Hopkins (on behalf of the Transport Agency) and Mr Grala (on behalf of Mercury NZ Ltd) dated 2 and 4 August 2017. I was not a party to that conferencing.
13. In relation to those matters that First Gas has an interest in, I support:
- (a) the definition of the Southdown Site as agreed between the witnesses, which specifically includes reference to 'gas supply infrastructure including the high pressure gas pipeline, pigging station and connection';
 - (b) the inclusion of Southdown-specific conditions in a separate section of the conditions for the Notice of Requirement (but also the retention of NU conditions recommended in Ms Hopkins Evidence in Chief relating to First Gas assets outside the Southdown Site);

- (c) the inclusion of the following conditions as recommended during expert conferencing by Ms Hopkins:
 - (i) SD.2(c), (g) and (h) – confirmation of approval from First Gas. This appears to achieve the same outcome in relation to First Gas' assets as Mr Grala's recommended SD.1;
 - (ii) SD.3(b) and (c) – Southdown Construction Management Plan to be prepared in consultation with First Gas. This appears to be generally consistent with Mr Grala's recommended SD.10;
 - (iii) SD.7 – waiver of approvals under s176 of the RMA, although my view is that for First Gas this should also extend to activities currently enabled via designation 9102, being: operate, maintain, repair, upgrade and renew the pipeline and ancillary facilities. In note Mr Grala's recommended SD.8 includes reference to 'upgrade' whereas Ms Hopkins' SD.7 only refers to maintenance.
- (d) In respect of Mr Grala's recommended condition SD.3, my understanding is that while First Gas does not require its assets to remain within the confines of the Southdown Site (external locations are being investigated) the ability to connect to the site is required. On that basis I do not consider it appropriate to impose such a condition in relation to First Gas assets.

14. I express no opinion or preference for other conditions in the joint witness statement, provided the gas transmission network is able to be operated safely, effectively and efficiently both during construction and in the longer term.

Hywel David Edwards

21 August 2017

ATTACHMENT A:
**FIRST GAS TECHNICAL STATEMENT – SOUTHDOWN ASSET
RELOCATION**



First Gas Limited
42 Connett Road West, Bell Block

Private Bag 2020, New Plymouth, 4342
New Zealand

P +64 6 755 0861
F +64 6 759 6509

18 August 2017

First Gas Technical Statement – South down Asset relocation

This technical statement has been prepared to provide clarification to the board of enquiry First Gas' position in relation to the south down section of the East West Link Road and the infrastructure which will be affected. First Gas submitted a neutral position to the East West Link project on 22 March 2017.

First Gas owns and operates approximately 2500km of high pressure natural gas transmission pipelines throughout the North Island, included in these assets is the East Tamaki to Taupaki section designated on the Auckland Unitary Plan (reference 9102).

The East Tamaki to Taupaki network section includes the south down delivery station located on the southern boundary of the Mercury NZ Limited site defined as Lot 1 DP 178192. The delivery point infrastructure includes:

- A main line valve - safety apparatus for isolating sections of pipeline and depressurising by way of atmospheric discharge
- Pig receiver – facilitates internal inspections of the pipeline;
- Delivery point – high pressure transmission natural gas is reduced to domestic pressure network. In this case the customer was a large consumer and as such the gas delivery was facilitated at transmission pressure; and
- Associated monitoring equipment and ancillary structures.

The proposed motorway location at the south down site will require a relocation of the First Gas delivery point whilst still maintaining the current and future station purpose(s). The following constraints have determined the need for asset relocation:

- Planned venting of the pipeline for maintenance or emergency situations unable to be safely facilitated. The discharge of natural gas under high pressure directly adjacent to the motorway has the capacity to distract motorists and increases the risk of gas ignition;
- Unplanned gas discharges from the delivery point regulator equipment have the same risks highlighted above. The site in its current state has had the delivery point regulators and associated equipment removed until such time as the demand for supply is required; and
- Risk to site infrastructure from vehicle or debris impact.

Any relocation of the delivery point will need to facilitate the discharge of significant volumes of natural gas and maintain the option of supplying potential gas users in this area. A number of proposed relocation areas have been provided, however any potential relocation requires detailed investigation which is being undertaken over the coming weeks.

Kind regards



Adam Du Fall

Land and Planning Manager - Acting

