

BOARD OF INQUIRY

NORTHERN CORRIDOR IMPROVEMENTS PROPOSAL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under s149J of the Resource Management Act 1991 to consider notices of requirement and applications for resource consent made by the New Zealand Transport Agency in relation to the Northern Corridor Improvements Proposal

**FIRST MEMORANDUM OF COUNSEL FOR
TRANSPOWER NEW ZEALAND LIMITED:**

Proposed witnesses

16 May 2017

Counsel instructed:

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MAY IT PLEASE THE BOARD:

1. I act for Transpower New Zealand Limited (“**Transpower**”).
2. The Inquiry Procedures require, by today’s date, all parties to “confirm any witnesses that they wish to appear on their behalf (names and topics/area of expertise) with the EPA”.
3. Transpower, in its submission, sought to protect the National Grid generally and in particular to ensure that appropriate conditions were adopted to protect the existing ALB-WRD C circuit and accommodate both a future replacement circuit and an additional circuit. Transpower has had a high level of engagement with NZTA and significant, positive, progress has been made (for example, refer to the evidence of Mr McGregor at paragraphs 7.20-7.24). NZTA has offered up additional conditions (see NU.2-NU.6 attached to the evidence of Mr McGahan), which, together with the further engineering work undertaken, go a long way to addressing Transpower’s concerns.
4. Transpower is grateful to the NZTA for its efforts to resolve matters, and is confident, with some additional time, that it will be able to confirm the engineering solution and associated risks can be adequately managed through design, construction management, and a final agreed set of conditions. There is some complexity to the issues and Transpower has not yet, in the time available, been able to reach that point. However, discussions are continuing and it remains possible that full agreement will soon be reached on the key matters and conditions. It is Transpower’s hope that this will be the result.
5. However, if that does not transpire by the time evidence is required, Transpower may need to produce some evidence to identify and explain what remains outstanding. It might in any event be appropriate for some evidence to be provided to explain the position, any residual risks, and support the agreed conditions. Accordingly, Transpower gives notice that the following witnesses may be called:
 - (a) Rajeev Chand, Senior Project Engineer – Substations and Cables.
 - (b) Mr Horne, Independent Planner.

6. Transpower will keep the Board up to date in respect of progress.

A handwritten signature in blue ink, appearing to read "James Gardner-Hopkins". The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke at the end.

James Gardner-Hopkins
Counsel for Transpower