

**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

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**SECOND MEMORANDUM OF COUNSEL FOR  
TRANSPower NEW ZEALAND LIMITED:**

**Evidence / conditions**

**25 May 2017**

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Counsel instructed:

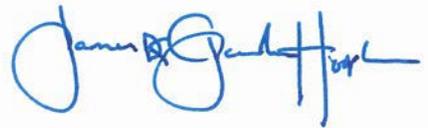
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**MAY IT PLEASE THE BOARD:**

1. The Inquiry Procedures require submitters to deliver their written statements of evidence (hard copy and electronic) to the EPA by 2pm on Thursday 25 May 2017, and copy the same to the NZTA.
2. Transpower's First Memorandum of Counsel: Witnesses (16 May 2017), recorded the ongoing efforts being made between Transpower and NZTA to resolve matters between themselves. They have continued to engage since then, and further refinements to the conditions offered up by NZTA have now been agreed. A copy of the now agreed conditions is **attached** to this memorandum (showing mark-ups from conditions NU.2-NU.6 as contained in the evidence of Mr McGahan).
3. Transpower is satisfied that the conditions (as agreed) provide appropriate and necessary protection, and clear notice, to sufficiently satisfy its concerns. On that basis, Transpower no longer intends to call evidence in support of its submission. NZTA witnesses can, if need be, formally "produce" the agreed amended conditions.
4. Transpower intends to maintain a watching brief in respect of the proceedings. Separate workstreams will also continue between Transpower and NZTA to advance further design, engineering, and risk matters.



James Gardner-Hopkins  
**Counsel for Transpower**

## Network Utilities

NU.1 The Consent Holder shall ensure that construction work does not adversely impact on the safe and efficient operation of network utilities. The scope and timing of necessary utility relocation and protection works shall be developed and agreed between the Consent Holder and network utility providers to mitigate any safety hazards and provide cost efficiency for the required works.

### *Transpower*

NU.2 No works are to occur within the existing Transpower designation, until such time as all necessary Resource Management Act 1991 approvals have been obtained to authorise the installation of two 220kV circuits (three cables each) ~~on the same general alignment as the existing 220kV circuit~~, any protective tunnel structure and any necessary practical access **and jointing requirements.**

NU.2A **This infrastructure is intended to be provided for within the existing Transpower designation, or, if that is not feasible, within the NCI Project designation. If a location within the NCI Project designation is not feasible, a solution may be required that bypasses all or part of the NCI Project designation. If this is the case, no works are to occur within the existing Transpower designation (without the prior approval of Transpower), until such time as all necessary authorisations for Transpower's alternative works have been obtained. In addition, should it be necessary to construct Transpower cables and any protective structure outside the existing Transpower designation, no works are to occur within the Transpower designation (without the prior approval of Transpower) until these cables have been constructed and commissioned and the existing cables decommissioned.**

NU.3 The Consent Holder shall ensure that the detailed design for the NCI Project makes provision for a conduit that is sufficient to allow Transpower to install, operate and maintain two 220kV cables ~~in the same general alignment as the existing 220kV circuit that traverses~~ through the NCI Project area, **unless it is found not to be practicable to do so, in which case a solution to bypass all or part of the NCI Project area shall be provided for in the detailed design insofar as it affects the NCI project area.**

NU.3 At least 20 working days prior to the commencement of construction, an Electricity Infrastructure Management Plan ('EIMP') prepared in consultation with Transpower New Zealand Limited shall be submitted to the Council (Team Leader Northern Monitoring) for certification. A summary of the feedback received from Transpower shall be included within the EIMP.

NU.4 The Consent Holder shall carry out works in accordance with the certified EIMP.

NU.5 The EIMP shall include methods and measures to ensure that the NCI Project provides for Transpower's two 220kV circuits ~~on the same general alignment as the existing 220kV circuit~~ as follows:

- a. Construction of a protective structure for the installation of the two 220kV circuits that does not adversely affect the existing 220kV circuit;
- b. Provision of 24/7 access to the cables and the cable joint bays (options include the implementation of a cut and cover protective tunnel); and
- c. Retention of the ability to maintain a 30-minute thermal transient rating of 2000 MVA and a thermal continuous rating of 670 MVA thereafter.

NU.6 The EIMP shall also include the following details:

- a. Procedures to be employed when working within proximity of Transpower's cables;
- b. Notice periods to be provided to enable Transpower representatives to observe construction works in proximity of Transpower's existing cables; and
- c. ~~Methods for ensuring that access to Transpower's existing 220kV is maintained during the~~