

Before the Proposed Te Tai o Poutini Plan - A Combined District Plan for the West Coast, Hearings Panel

Under the Resource Management Act 1991 (the Act)

In the matter of the Proposed Te Tai o Poutini Plan: A Combined District Plan for the West Coast – Hearing Topic 4

- **Energy, Infrastructure and Transport**

Between **Te Tai o Poutini Plan Committee**
Comprising the Buller, Grey and Westland District Councils

And **Transpower New Zealand Limited**
Submitter 299 and Further Submitter FS110

**Statement of Evidence in Chief of Jordan Brett-Allen
Shortland-Witehira**

Dated 30 October 2023

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1 Executive Summary

- 1.1 **Maintenance & Access Needs:** Transmission line components require ongoing inspection and routine maintenance, to address aging, willful damage or corrosion and degradation due to wind, rain, and pollutants. Physical access to transmission lines is required for all maintenance and project work, including for staff, vehicles, helicopters, and large construction equipment. A regulated transmission corridor is essential for providing adequate access and working space at structures, and mid-span.
- 1.2 **Recognizing the Network's Significance:** The transmission assets within the West Coast region play a foundational role in the region's electricity supply. Their pivotal nature makes it vital to consider the broader implications of third-party activities on the regional electricity network.
- 1.3 **Infrastructure Safety:** Prudently designing buildings, structures, or activities with the transmission line in mind (including beneath conductors (that is the wires)) ensures vital National Grid (**Grid**) infrastructure is protected and can be maintained and upgraded. 'Under-build' can delay, restrict, or compromise the ability of Transpower New Zealand Limited (**Transpower**) to undertake maintenance or project work.
- 1.4 **Restoration Challenges:** When a system fault occurs, the Grid would need to be restored quickly, to reduce impacts on businesses and communities throughout the West Coast region, and beyond. Restoring supply becomes challenging if transmission lines are difficult to access due to intensive developments that may be constructed under and around them. Undergrounded transmission lines can have significantly longer restoration times.
- 1.5 **Safety Concerns:** Transpower operates its assets as safely as possible, but there are risks due to the high voltages being carried on the network. Lethal electric shocks can be caused by earth potential rise (step, touch and transferred voltages), conductor drop and flashovers. Hazards can also be caused by trees, mobile plant and other materials coming into contact with overhead lines.
- 1.6 **Aesthetic and Functional Concerns:** Transmission lines can also cause concern or annoyance, because of how they look, their mechanical or electrical noise, electrical interference, and perceived health effects. These effects can lead to requests for Transpower to underground lines, or relocate lines, or to raise or lower conductors.

- 1.7 **National Grid Yard Specifications:** The 10m to 12m National Grid Yard (either side of the centerline) is the area (measured horizontally) beneath the conductors in “everyday” wind conditions, being the conditions when line maintenance can be carried out. A 12m setback around each National Grid support structure is also required for access, maintenance, and safety purposes. This area is the bare minimum to ensure that Transpower’s maintenance, repair, upgrade, and operation activities are not compromised.
- 1.8 **Restrictions Beneath Transmission Lines:** Sensitive activities, commercial buildings, and intensive development (including some farm buildings) should be avoided beneath transmission lines because of electrical risk, annoyance caused by the transmission lines, and the challenges presented by these activities when Transpower needs to access, maintain, upgrade, and develop the lines.
- 1.9 **Limitations of NZECP 34:2001:** While the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) prescribes minimum safe distances, it does not provide a comprehensive system for the management of these distances. This is to say, it does not prevent under build and does not ensure the operation, maintenance, upgrade, and development of the National Grid is not compromised.

INTRODUCTION

2 Qualifications and experience

- 2.1 My full name is Jordan Brett-Allen Shortland-Witehira. I am employed by Transpower as an Engineer – Lines within the Tactical Engineering Team.
- 2.2 For my qualifications and experience and other introductory comments, please refer to paragraphs 4-12 of my statement of evidence for Hearing Topic 3 (“Hearing 3 Evidence”) dated 16 October 2023.
- 2.3 I have read the Code of Conductor for Expert Witnesses contained in the Environment Court Consolidated Practice Note (2023) and agree to comply with it. As I am employed by Transpower, I acknowledge I am not independent; however, I have sought to comply with the Code of Conduct when preparing my written statement of evidence and will do so when I give oral evidence before the Hearings Panel. Unless stated otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
- 2.4 As stated in my Topic 3 evidence, where relevant I have relied on the Hearing Topic 1 and 2 evidence of **Ms Rebecca Eng**. This includes the description of National Grid assets in the West Coast region set out in Ms Eng’s evidence (and subsequently clarified in Ms Eng’s Topic 4 evidence).

3 Scope of evidence

- 3.1 My evidence will cover:
- The risks to third-party activities arising from activities in proximity to the National Grid, such as electric shock, earth potential rise, conductor drop, flashovers, and structure failures.
 - The risks to transmission infrastructure arising from activities (such as mobile plant or machinery works associated with construction as detailed in paragraph 5.18) undertaken by third parties close to the National Grid.
 - The potential impacts of other activities on the National Grid, including those sensitive to the National Grid or otherwise incompatible.
 - How risks can best be managed, including through the use of corridors.

Appendix A

- The basic components of an overhead transmission line.
- How Transpower operates, maintains, and upgrades the National Grid, including the activities commonly carried out.
- Why access and clear working space are important for operating, maintaining, and upgrading the National Grid.

Appendix B provides an overview of NZECP34:2001 and its limitations.

REGULATING THIRD PARTY ACTIVITIES NEAR THE NATIONAL GRID

4 Managing the activities of others

- 4.1 The transmission network gives rise to specific risks, such as lethal electric shocks. These risks increase if there are incompatible activities located under the electricity transmission lines or other National Grid assets, or in close proximity to them.
- 4.2 Preventing sensitive and incompatible activities from establishing under the transmission lines, along with controls on activities that will occur near electricity transmission lines, will assist the National Grid to be reliable and safe while serving future generations.
- 4.3 A preventative approach to the management of the transmission corridors and a proactive approach to ensure safety for high-risk activities regularly occurring under National Grid lines leads to better outcomes for the National Grid assets and for third parties, as they would suffer less disruption of their activities.

5 Risks associated with the National Grid

- 5.1 The main hazard associated with high voltage transmission lines is electric shocks. The risk and severity of electric shocks varies depending on the transmission voltage and type of exposure (for example. direct human contact, mobile plant, or vegetation). Risks are most likely to be highest within 10m to 12m of the centreline of a transmission line. However, some associated effects can be transferred beyond 12m.
- 5.2 Lethal electric shocks can be caused by:
 - a Earth potential rise;
 - b Conductor drop;
 - c Flashovers (coming into contact with the line conductors or where the electricity arcs from a conductor onto an object such as a structure or vegetation that is too close to a line);
 - d Equipment or structure failure.
- 5.3 These hazards can occur as a result of third-party activities (such as mobile plant) encountering conductors during construction activities, or earthworks occurring too close to structures or mid-span thereby reducing clearance distances. These

hazards can also occur as a result of structures being located close to transmission assets, and support structures in particular. All of these things can endanger safety and compromise the operation of the National Grid.

Earth Potential Rise

- 5.4 Earth Potential Rise (EPR) is usually caused by an earth fault at a support structure. An earth fault occurs when an energised conductor comes into contact with, or flashes over to, the tower or any earthed object. This can occur through an insulation failure as a result of lightning, pollution or foreign objects (such as kites, balloons, or drones).
- 5.5 During an earth fault, there is a significant current (5-40 times normal) flowing through the faulted line from the power source into the fault point. The return current causes momentarily high voltages to appear on both the tower and the ground around the base of the tower. The voltages are highest on the faulted support structure and decrease along the ground as you move further away from the faulted support structure. The area of risk can vary depending on the soil conditions, line configuration, and nature of the fault.
- 5.6 The earth fault current causes EPR around the faulted support structure, which in turn results in “step and touch” voltage hazards and transferred voltage hazards (discussed below).
- 5.7 EPR can cause electric current to flow through people in the affected area at the time. The impact of that ranges from a discomforting feeling through to a serious injury or death.
- 5.8 Step and touch, and transferred potential hazards from transmission tower structures, are low probability events. However, they are significant hazards because of the possible consequences.
- 5.9 A touch voltage can occur when a person or animal comes into contact with the structure while standing on the ground, thus causing a voltage difference between the feet and hands. A step voltage can occur when a person or animal is near a structure during a fault event and a voltage difference occurs between the feet.
- 5.10 Transferred voltage hazards can occur where continuous long conductive structures or fences are located close to the support structure. High current and voltage may transfer to them from the support structure through the ground, and then travel some

distance down these structures causing an electrical hazard some distance from the faulted support structure.

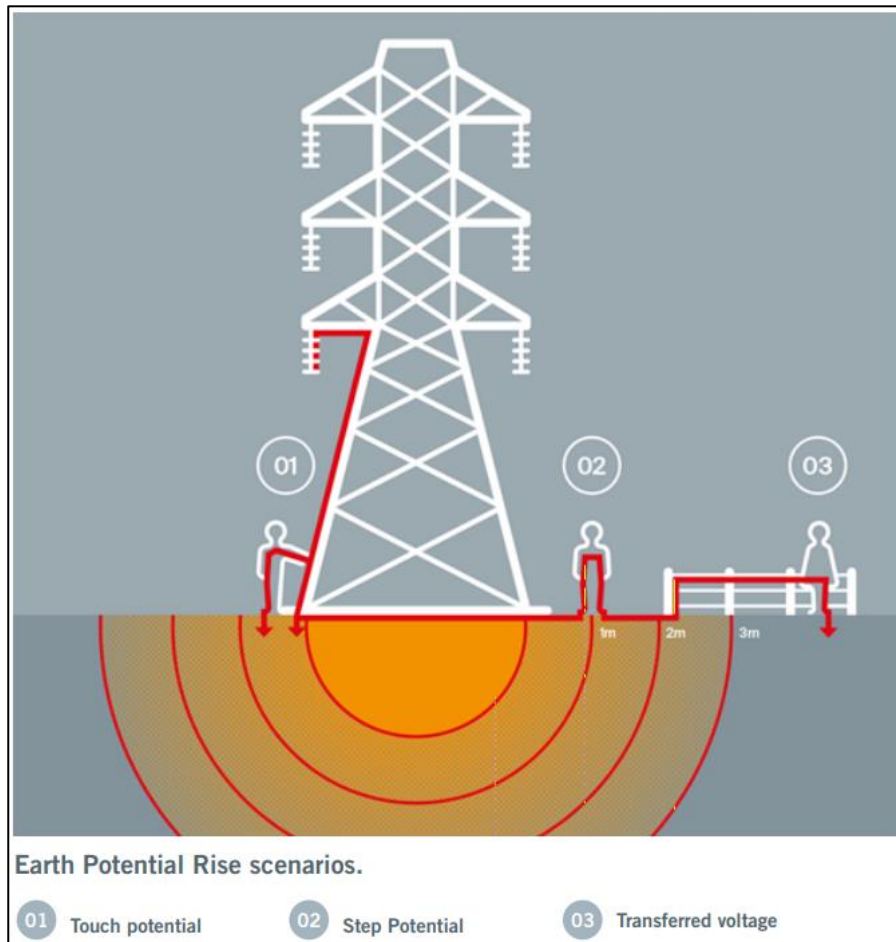


Figure 1 Earth potential rise scenarios

Conductor drop

- 5.11 The conductor can drop to the ground should a mechanical failure occur to the support structures, insulators and hardware, or the failure of pressed mid-span joints. In addition, electrical failure can lead to the mechanical failure of the conductor or the pressed mid-span joints.

- 5.12 While it is rare for a support structure, conductor, or the conductor hardware to fail causing the conductor to drop to the ground, it can happen (see Figure 2 below).



Figure 2 Conductor drop.

- 5.13 Historically, most conductor drops have occurred in rural areas. On rare occasions, a conductor drop has occurred in an urban setting. In an urban setting, more intensive development places more people and property at risk.
- 5.14 The consequences of a conductor dropping can vary depending on the activities undertaken under the line. Figure 3 below shows impacts within a dwelling following a conductor drop. The internal electrical switchboard and appliances have been damaged by the significant transfer of voltages to earth from an adjacent transmission line.



Figure 3 Electrical damage following a conductor drop.

- 5.15 A conductor drop poses electrical risks, as well as the mechanical risks of a large load dropping. On the West Coast there are duplex and simplex 110 kV lines weighing from 0.5kg/m to approximately 3.2kg/m. For a typical span (300m), the weight of the conductor at the point of impact could be from 150kg to as high as 960kg. That weight could cause substantial property damage and risk to human health and safety.

Flashovers

- 5.16 A flashover is a major electrical discharge. Usually in the form of an electric arc, it leaps or arcs from the conductor across the insulator string to the support structure (or from the conductor to another object) resulting in a short circuit.
- 5.17 Flashovers can occur from lightning strike, contamination of the insulator or when a person or object is too close to, or comes into contact with, the conductors.
- 5.18 Third party activities involving mobile plant or machinery, such as excavators, hi-abs and cranes, have the potential to reach up to, or above, the height of the conductors. It is essential that the use and location of such machinery is carefully considered to avoid close proximity or contact with the conductor, as shown in Figure 4. Coming into close proximity to a live conductor and causing a flashover (that is the flashover will occur prior to contact) can:
- a compromise the safety of the machinery operators or workers or members of the public in or near the machinery and result in electric shock;

- b damage the machinery or the line itself; and
- c affect the operation of the National Grid and the security of supply.

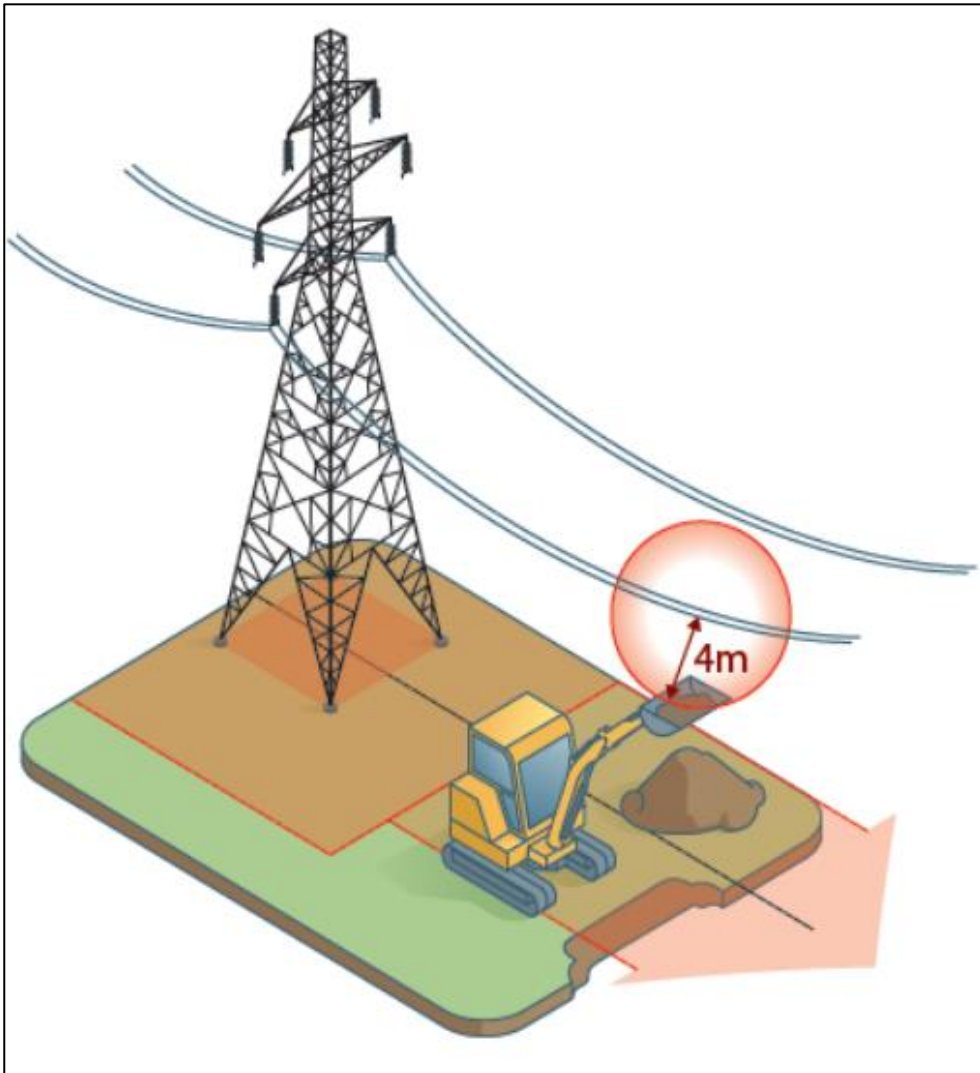


Figure 4 Minimum clearance required between conductor and mobile plant to avoid flashover.

- 5.19 The risk of incidents such as these occurring increases if incompatible activities are allowed to be undertaken or are intensified under or near electricity transmission lines.

Equipment or structure failure

- 5.20 Transmission lines are designed to withstand specified levels of weather conditions (for example wind speed, snow, ice). If these levels are exceeded, it is likely that failure will occur. Failure events include broken or fallen conductors, collapsed towers and support structures or any other substantial component failure which results in high risk of property damage, injury, and electricity disruption.

- 5.21 Transpower designs all components of the National Grid to withstand extreme events in accordance with international best practice. Transpower's assets have higher design specifications than lower criticality and consequence assets (such as distribution lines). This is in keeping with Transpower's civil defence responsibilities. In an emergency event, the National Grid is required to continue functioning, to the greatest extent possible, both during and after the event.
- 5.22 Although the probability of a failure event is low, there is the possibility that injury or damage could occur if a person, animal, or item of equipment is in the wrong place at the wrong time.

6 Impact and Risks of Third-Party Activities

- 6.1 In addition to the risks associated with the National Grid on third party activities outlined in Section 5 above, activities can also compromise the Grid itself. The following outlines such activities and how the National Grid can be compromised. My Topic 3 evidence covers the effects of inappropriate earthworks near the National Grid.

7 Land use compromising the Grid

- 7.1 The placement of dwellings or work areas under transmission lines creates substantial challenges for Transpower when maintenance, upgrade, and development work is required. In addition to the risk to the transmission assets themselves, both land use and subdivision can prevent physical access to structures and the mid-span area.
- 7.2 Maintaining the National Grid is fundamental to Transpower's operations. Ensuring that the Grid delivers a safe, secure, and reliable electricity supply requires regular inspections and patrols based on asset age, type, environment, geographic location, and high-risk areas such as where lines are over major roads, rail, and urban areas. Unplanned activities during emergency situations can add further complexity to these operations.
- 7.3 In order to undertake maintenance work and upgrades, appropriate access to the National Grid must be retained. This includes not only planned activities, but also unexpected interventions necessitated by emergency outages, such as those experienced during the recent events from Cyclone Gabrielle. Consent authorities must consider this aspect when evaluating proposals for land use changes or subdivisions.

- 7.4 Access to the National Grid is important to protect the infrastructure corridor itself. As land use intensifies, it becomes increasingly difficult to identify routes for new assets. Encroaching land uses may compromise transmission lines, making it difficult or impossible to optimize existing lines and identify alternative routes for new lines. Within the district there are a few projects underway to increase conductor to ground clearance which requires direct access to the structure locations.
- 7.5 Proper regulation helps inform landowners of the constraints that National Grid lines impose on land use, and to clearly indicate how they can manage their activities.
- 7.6 A specific example of these challenges can be found in Auckland, where a dwelling was constructed that prevented Transpower from accessing the tower for grillage refurbishment work (see Figure 5). In 2014, a grillage refurbishment crew discovered a dwelling under construction directly below the Henderson to Roskill 110kV transmission line. Without prior consultation, this dwelling blocked access to the tower site, forcing Transpower to secure alternative access across four separate properties and requiring the removal of fencing and vegetation.



Figure 5 Dwelling blocking access to tower

7.7 As outlined in the evidence of **Ms Whitney**, the NPSET provides specific reference to sensitive activities (which include residential activities). The main hazard associated with high voltage transmission lines is receiving an electric shock. This is a risk which cannot be eliminated from an engineering perspective; it can only be mitigated or avoided.

Reverse Sensitivity

7.8 In addition to potentially exposing people and property to the risks outlined above, third party development and activities near overhead transmission lines can impact Transpower's ability to operate, maintain, upgrade and develop its infrastructure. Such activities can also give rise to reverse sensitivity effects.

7.9 Reverse sensitivity effects are caused by activities which are located near lines. They often relate to noise, visual, electrical interference, and perceived health and safety effects (humans and animals), as well as the limitations placed on land use in close proximity to the lines.

7.10 Physical separation of third-party activities from transmission lines can reduce the incidence of people who live and work nearby complaining about the line and requesting changes (i.e., limits or restrictions) to its operation.

7.11 The area or distance from the lines within which reverse sensitivity effects can arise may vary according to the type of issue raised, but they are most noticeable in the area to where the conductor swings out. Depending on asset type, this area can be out to 39m either side of the centreline.

7.12 Examples of equipment and technological sensitivities to Transpower's assets include:

- a electrical interference could have serious implications for places such as hospitals or rest homes which rely on the proper functioning of electrical equipment;
- b radio controlled systems and global positioning systems are also known to be affected by the close proximity of transmission lines. These systems are being used more commonly for communications and automated control systems in industrial processes;

Vegetation

- 7.13 Vegetation within proximity of the National Grid assets is also an issue. If a tree touches or comes close to touching the conductors and causes a flashover, dangerous voltages may arise on the tree itself or in the ground area around the tree that can result:
- a in a circuit fault that affects the operation and supply of the National Grid;
 - b injury or death to anyone who may be near the tree at the time of the fault; and/or
 - c damage to the tree, land or property.
- 7.14 Flashover to a tree where high voltages are involved can cause the tree to ignite and cause a wider fire hazard if the tree is near buildings or forests (see Figure 6).



Figure 6 Tree damage from fire caused by a flash over.

- 7.15 It is therefore vital that trees and all other vegetation are trimmed before they grow within 5m of a conductor (in any location). The proximity of vegetation to conductors should also be a consideration for land use activities such as subdivisions. Managed

placement, trimming or cutting of vegetation will ensure that the Electricity (Hazards from Trees) Regulations 2003 are complied with.¹

- 7.16 Landscaping to shield transmission lines from view is problematic due to the size of the infrastructure. If large trees are planted, care has to be taken to ensure that there will always be sufficient electrical clearance, without requiring excessive trimming. There is a risk that if a large tree is not sufficiently distant from the transmission line and it falls, it may contact and damage the transmission line.

Hazardous substances

- 7.17 Activities that involve, or introduce, large amounts of hazardous substances near transmission assets are a concern for Transpower in that they introduce substances which may be explosive or flammable in nature and pose significant safety issues, in addition to posing a risk to the operation of the Grid assets.
- 7.18 Examples of this type of facility are the establishment, or extension, of a service station development, or the storage of gas tanks under a line or adjacent to a substation.
- 7.19 The high-risk profile these activities could pose to an unknowing public, coupled with known mitigations, mean that Transpower need to be involved in the design and decision making early to ensure the risk is either avoided or mitigated.

8 Other Transmission Line Related Concerns

- 8.1 The presence of a transmission line can give rise to perceived health concerns and visual amenity issues, even some distance from the line.
- 8.2 In addition to general complaints arising from the presence of transmission infrastructure, Transpower also receives requests from landowners to underground existing overhead lines, raise conductors, or restrict future Grid works, particularly if they involve changes in visual appearance.
- 8.3 At the North Island Grid Upgrade Project ('NIGUP') Board of Inquiry into the then proposed 400kV capable Brownhill Road – Whakamaru North A line, a number of submitters raised concerns about both potential mechanical and electrical noise, and the potential effect on milking dairy herds in close proximity to the lines, as well as on

¹ For voltages of 110kV or higher, vegetation is considered a hazard once it is 4m from the conductor. A notice to trim or remove the vegetation can be given once the vegetation grows to 5m from the conductor. In practice, Transpower would cut two years growth off vegetation, so that a distance of at least 5m from the conductors is maintained.

the operation of sensitive electronic equipment such as radio-controlled systems. In most cases, these concerns were addressed by Transpower moving existing buildings away from the proposed line. It is noted that in general, Transpower seeks to avoid these existing activities where practical.

- 8.4 These complaints are much more difficult to address where new activities locate close to an existing transmission line, perhaps without understanding the effects that lines can have.
- 8.5 Noise can also give rise to complaints. Noise from a transmission line usually comes in two forms: mechanical noise and electrical noise:
- a Mechanical noise can come from vibration which causes a rattle of the line hardware (insulator attachments, steel members) or from environmental events such as high winds (wind whistling through conductors or over steel works).
 - b Electrical noise usually comes from some form of electrical discharge, or leakage. This generally can be heard discharging down insulators when it starts raining after a long spell of fine weather. In some cases, this corona discharge may be seen at night when insulators are polluted and electricity is seen discharging down from the conductor to the tower steel.
- 8.6 In some areas of New Zealand, landowners/occupiers have also raised concerns about electric and magnetic fields ('EMF') from transmission lines. I note that Transpower's assets operate well within the limits in the International Commission on Non-ionising Radiation Protection Guidelines for limiting exposure to time varying electric magnetic fields (1Hz – 100kHz)² (known as the ICNIRP Guidelines). These Guidelines are recognised by the Ministry of Health and the World Health Organisation.
- 8.7 Transpower's telecommunication assets comply with NZS2772.1:1999 Radiofrequency fields - Maximum exposure levels - 3kHz to 300 GHz. Other users of Transpower sites are also required to comply with this standard.

9 Management of risks

² ICNIRP. Guidelines for limiting exposure to electromagnetic fields (100 kHz to 300 GHz). Health Phys 118(5):483-524; 2020

- 9.1 Transpower manages risks when designing and constructing new assets, and through continuous assessments and maintenance of the existing assets. For example, when earth faults occur, the current is interrupted by protective devices at each end of the line to clear the fault in a fraction of a second.
- 9.2 However, engineering solutions such as this are only part of the answer. It is also vital that third parties do not interfere with, or compromise, the proper operation of the line, and that appropriate maintenance and upgrade work can be carried out when required.
- 9.3 This risk can be minimised by ensuring development is either avoided or is compatible with the electricity transmission lines. Where large scale development (such as subdivision) is proposed it can, and in my opinion it should, be designed to ensure that only appropriate activities occur under the lines. Appropriate activities include carparks, roads, stormwater infrastructure, or open space that does not involve buildings or structures.
- 9.4 Proper design of any underlying activities, including consultation with Transpower, is essential to manage risk.
- 9.5 Risk should be assessed and designed out of processes, equipment, and environments. Where the decision is still to develop in the vicinity of transmission line, consideration should be given to the following issues:
- a the safety of workers during any construction or build stages of the development (for example. builders, earth movers, and electricians);
 - b the safety of residents, workers and the public who may be working, living or recreating in the area after the development is completed;
 - c the safety of the line maintenance workers who are required to access the National Grid assets both during the development's construction and after its completion;
 - d whether the proposed development follows construction industry best practice; and
 - e access to structures and lines by emergency vehicles (ambulances, fire engines etc).

- 9.6 In addition, the planning, installation and use of buildings, structures as well as heavy lifting plant operations must take into consideration a number of key elements, including:
- a the location and configuration of the transmission line support structures;
 - b the inductive voltages that may be present and possible mitigation measures that may need to be applied;
 - c the vehicle movements, location of construction materials and height restrictions of both vehicles and workers necessary to avoid entering the conductor flashover zone;
 - d the transferred voltage hazards; and
 - e the EPR issues associated with workers in and around transmission line structures.
- 9.7 However, as discussed earlier, notwithstanding these measures, I do not consider that it is appropriate for activities where groups of people are present for extended periods to establish under the line. It is better to avoid such activities close to lines in order to minimise risk to people and property.

10 National Grid Corridors

- 10.1 The importance of transmission corridors has been recognised by Government policy makers. The NPSET, introduced in 2008, requires councils to give effect to its provisions in the plans they adopt under the RMA.
- 10.2 Transpower seeks to manage the network through a National Grid Corridor approach which is comprised of a National Grid Yard and a wider National Grid Subdivision Corridor. The National Grid Subdivision Corridor will be addressed at a future hearing.
- 10.3 As explained by Ms Whitney Transpower is seeking a National Grid Yard within the West Coast region for undesignated overhead transmission lines, to provide for:
- a A 10 or 12m corridor either side of the centreline, where specified activities are restricted (**National Grid Yard**); and
 - b A 12m setback around National Grid support structures (**National Grid Yard**).

- 10.4 The 10 or 12m National Grid Yard is the general area beneath the conductors in “everyday” wind conditions, being the conditions when line maintenance can be carried out. A 12m setback around each support structure is also sought for access, maintenance and safety purposes. Ms Eng describes Transpower’s strategic approach to the National Grid corridors in more detail.
- 10.5 The corridors Transpower seeks reflect the minimum areas considered necessary for the protection and operation/maintenance of the National Grid.

11 Conclusion

- 11.1 The National Grid is enduring critical infrastructure, both locally and nationally. It is critical that there is a planning framework in place that will enable development and other asset maintenance to occur efficiently.
- 11.2 Preventing sensitive and incompatible activities from establishing under the transmission lines, along with controls on activities that will occur near lines, will assist the National Grid to be reliable, and to have a managed environmental footprint while serving future generations.
- 11.3 It is critical that a preventative approach is taken to the management of the transmission corridors and a proactive approach is taken to ensure safety for high-risk activities regularly occurring under National Grid assets.

Jordan Shortland-Witehira

30 October 2023

APPENDICES:

APPENDIX A – ACTIVITIES UNDERTAKEN BY TRANSPOWER

1 Basic components of an overhead transmission line

1.1 Overhead transmission lines consist of five basic components:

- a conductors (wires);
- b structures;
- c insulator sets;
- d foundations; and
- e earthwires.

1.2 Transmission line components are designed to perform particular functions, and it is often difficult (or not possible) to change their look, location, or size to minimise adverse effects, without compromising that function. The majority of components used on a transmission line are manufactured to standard designs which are used all around the world.

1.3 When determining structure requirements, a compromise is made between the number of structures, structure strength and the structure height. The taller and stronger the structures, the fewer structures that are required. This is evident when you compare a typical pole line to a tower line - significantly more poles are required than towers to traverse a given distance. Generally, the higher the voltage of the transmission line, the taller the structures needed to support the conductors, due to electrical clearance requirements. Within the West Coast region, there is a variety of support structures on the National Grid transmission lines, including steel lattice towers, pi poles and single poles.

2 Operation, maintenance, and upgrade of transmission lines

Inspections of National Grid assets

2.1 To ensure the National Grid delivers a safe, secure, and reliable electricity supply, all assets need to be patrolled and inspected on a regular cycle.

2.2 Transpower carries out routine patrols and condition assessments to determine maintenance, refurbishment, or upgrade requirements.

- 2.3 The frequency of inspections depends on the asset's age and type, its environment and geographic location. This includes, for example, whether the asset is located in a high-risk area, such as where lines are located above major roads, rail or urban areas.

3 Routine patrols

- 3.1 A routine patrol involves viewing every asset annually, at a minimum, to identify any defects or situations that may affect the operation or safety of the National Grid in the short term. Items identified on patrols include damaged or broken insulators, impediments on the conductors, vegetation growth, access issues, land subsidence, and developments or activities under or near the lines.
- 3.2 Unsafe developments or activities under or near the lines may only be identified by Transpower once per year. This assumes that the unsafe activity occurs or is present on the day of the patrol, and that it is noticed by the patrol team.
- 3.3 The fact that unsafe developments and activities may occur for some time before they are identified is a further reason why Transpower seeks provisions in the Proposed Plan to assist land users to adopt safe operations and practices to begin with.

4 Condition assessments

- 4.1 A full condition assessment involves every line component being inspected and, in some cases, tested on a time-based schedule. Condition assessments are undertaken every three to seven years, depending on the asset type and the environment the asset is located in.
- 4.2 Condition assessments require vehicular access to all transmission line structures and conductors.

How patrols and assessments are undertaken

- 4.3 Routine patrols and condition assessments of support structures are carried out by field staff or contractors using a 4-wheel drive utility vehicle or an all-terrain vehicle to get as close as possible to the base of each structure.
- 4.4 Transpower's conductor condition assessment inspections also include the use of drones and helicopters for closer observation of developing defects by taking thermal images and high-resolution photographs. This allows more detailed mid-span

inspections of conductors, conductor joints and hardware as part of the condition assessment programme.

- 4.5 Conductor tests are also carried out by a remote-controlled conductor robot that travels down the span taking images and data and relaying this to a computer on the ground. Alternatively, it can be done by line mechanics accessing the conductor via a conductor trolley or by being suspended under a helicopter, mid-span, to measure joint resistance by testing.

5 Maintenance activities

- 5.1 From these routine patrols and condition assessment inspections, a wide range of maintenance work is identified and incorporated into a consolidated work programme. The work programmes are developed to ensure components are replaced or refurbished well in advance of their failure point.
- 5.2 Transmission line structures can be maintained almost indefinitely by practices such as painting of towers, concrete encasement of existing grillage foundations and replacement of insulators and conductors.
- 5.3 The maintenance activities that occur most frequently (some of which involve earthworks) are:
- a foundation refurbishment;
 - b tower refurbishment including abrasive blasting and painting;
 - c all aspects of tower conductor and insulator (and associated hardware) maintenance or replacement;
 - d vegetation and tree control; and
 - e Earth Potential Rise (**EPR**) mitigation.
- 5.4 Transpower consistently carries out a planned maintenance programme within the West Coast region.
- 5.5 Within the West Coast region, planned maintenance works include those listed above, noting that the assets will need to be maintained beyond the life of the District Plan and therefore any buildings, structures and activities allowed now (or during the life of the District Plan) will have longer term implications for the Grid.

Foundation refurbishment

- 5.6 Tower foundations include grillage foundations, that is directly buried steel.
- 5.7 Inspecting these foundations requires the whole foundation to be dug out on all four legs using earth moving machinery such as excavators.
- 5.8 If the foundation needs to be excavated, the tower must first be supported using props or guy wires before excavation.
- 5.9 Figure 7 and Figure 8 below give an indication of the amount of spoil and land disturbance required for a typical grillage foundation strengthening project.



Figure 7 Tower Grillage foundation replacement



Figure 8 Land disturbance for grillage foundation strengthening.

Tower refurbishment

- 5.10 Tower painting is a significant on-going maintenance project for Transpower.
- 5.11 Painted transmission towers have a coating life of approximately 14-18 years. The timing varies, depending on the environment where the tower is located.
- 5.12 Once the galvanising on a tower reaches its end life, the bare steel shows a combination of alloying with rust breakout in more corrosive areas (see
- 5.13 Figure 9).



Figure 9 Tower corrosion

- 5.14 The longer a tower is left to corrode, the more extensive the steel surface preparation is, therefore increasing the cost of the painting work. Additional tower steel and bolt replacement may also increase with time due to excessive corrosion.
- 5.15 Tower painting can be disruptive for people who live and work near towers because of the preparatory activities required.
- 5.16 Prior to painting towers, wet abrasive blasting may be undertaken. This can cause material to become airborne. People and property located near this activity (that is where lines are “under-built”) need to be protected from this material. Figure 10 and Figure 11 (below) show houses and cars being draped with protective covers during abrasive blasting. As seen from these photos, not all effects (such as debris and emissions of airborne particles) can be eliminated or fully mitigated using covers due to the complex terrain.



Figure 10 Tower painting in an urban setting, note the extensive polythene sheet protection.



Figure 11 Tower painting in an industrial setting showing garnet debris falling onto covered cars.

- 5.17 By comparison, in areas where there is no under-build, methods such as geotextile matting laid under the electricity transmission structures, can more easily capture debris from tower painting (see Figure 12 below).



Figure 12 Abrasive blasting in area with no under-build.

- 5.18 In areas with underbuild, Transpower's resource consents can direct the use of less intensive blasting, hand tool surface preparation or painting processes. Not only does this increase costs (by \$15,000-\$20,000 per structure) due to lower productivity, but it also reduces the quality and life of the paint system as the surface preparation is of lower specification. As a result, towers need to be painted more frequently (every 7-10 years, instead of every 14-18 years), leading to more frequent disruption to the people living or working under the electricity transmission lines.

Conductor repair and replacement

- 5.19 Conductor repair and replacement is a significant part of transmission lines management. This is due to conductors reaching their end of life or conductors requiring upgrading to ensure a resilient National Grid.
- 5.20 Conductor repair and replacement work involves:
- a stringing and tensioning work sites to locate pullers and tensioners; laying down sites; storage; as well as an area for working;
 - b accessing each support structure to remove the existing insulators and installing stringing equipment, such as running blocks;
 - c support structure and foundation strengthening, where necessary;

- d enabling works, such as parallel body extensions (shown in Figure 14), earthworks, new structures and others, as necessary;
- e rewiring (using the old conductor to pull out the new conductor);
- f sagging operations at each tower to ensure even and consistent sag profiles;
- g reinstalling the insulators, including clipping in the conductor; and
- h removal of plant and reinstatement of land.

5.21 Access for maintenance work on conductors presents its own challenges. For example, access to conductors is usually limited to ground base operations using elevated work platforms or cranes or lowering the conductor to the ground. In some cases, it is possible to suspend line mechanics from helicopters, but this involves long periods of helicopter time while the work is being carried out below.



Figure 13 Maintenance work being carried out using helicopters.



Figure 14 Parallel Body Extension being installed on the BPE-WRK-A line.



Figure 15: Conductor trolleys on duplex conductor

- 5.22 From time to time, Transpower needs to access the conductors at mid-span for inspection purposes or to carry out repairs. Mid-span damage can be caused by

lightning or corrosion damage, or could be caused by third party activities under the electricity transmission line, such as smoke or fires; vehicle or mobile plant contact/flashover; or vegetation touching and causing flashovers.

- 5.23 Conductor replacement or mid-span conductor repairs include inserting new sections of conductors, new joints, mid-span repair joints or sleeves. This work requires a relatively clear area under the electricity transmission line where the works are carried out. In some cases, such as wholesale reconductoring of the line, this clear area may be required along the entire line.
- 5.24 Conductor repair methods include inserting new sections of conductors, new joints, mid-span repair joints or sleeves and removing impediments such as kites, balloons, and electric fence wires. In all cases, access to the conductor is necessary.
- 5.25 Mid-span under-build, particularly dwellings and buildings forming part of intensive developments (where people and activities are most inconvenienced), creates significant additional costs for Transpower when carrying out any reconductoring or mid-span repair works.
- 5.26 There will be cases where this work cannot be undertaken efficiently due to the presence of people or an inability to position plant where required. Alternatives, such as building a new or bypass line may need to be considered. In some instances, it may be necessary to consider temporarily relocating people living and working under the line - at significant inconvenience and cost to all concerned.
- 5.27 A reconductoring operation can cause inconvenience to the community by restricting vehicle and pedestrian access to public or commercial areas such as schools, businesses, and parks. Some commercial and industrial activities may need to shut down during conductor repairs, and/or can be affected by helicopter use.
- 5.28 To provide a safe work site, an area may be closed off, particularly in a span where there is potential for inadvertent loss of control of load or machinery failure.
- 5.29 Intensively used buildings and commercial operations risk compromising Transpower's ability to maintain the line (as it can be difficult to shut down the premises) and are at higher risk from electrical hazards during their day-to-day operations (due to number of people on site and the use of large mobile plant). The emissions (such as smoke) produced by the activities undertaken under the line, and large mobile plant operating, can put the line itself at greater risk of damage or deterioration. Examples include high-level storage facilities, factories, large scale

industrial buildings, commercial operations that emit dense smoke, dust or chemicals and high-density lifting operations involving forklifts, cranes, tip trucks and similar vehicles.

- 5.30 If allowed to be constructed under conductors, these intensively used buildings and commercial operations would need to either be vacated during reconductoring operations or protected by constructing high-cost scaffolding and nets. This assumes that there is sufficient space, and air clearance, on site for the construction of such structures, which is not always the case. Constructing and dismantling the scaffolding and netting³ needed to protect the undercrossing line in Figure 16, cost in excess of \$350,000.



Figure 16: Scaffolding protection structure for stringing

- 5.31 Reconductoring a typical existing line section would likely take two to three weeks. Even smaller maintenance work typically takes 8-12 hours. So, it is practically very difficult for Transpower to work around intensive industry operations without both parties incurring large time or financial costs.
- 5.32 I acknowledge that less intensively used agricultural and horticultural buildings are less vulnerable to disruption and may be able to locate beneath conductors – mid-span, subject to compliance with NZECP 34:2001 and provided that any associated activities do not pose risk to either the operator or the line (that is mobile plant

³ Figure 16 shows live line scaffolding needed to protect the 110kV network while a 400kV line is being wired overhead.

intruding on the MAD.⁴ These types of buildings can easily be vacated (or kept uninhabited) while maintenance activities are undertaken.

6 Undergrounding transmission lines

- 6.1 Transmission lines can be undergrounded in some situations to minimise impacts on sensitive activities. Usually, lines are undergrounded before residential or commercial development is undertaken, as the process of installing underground cables at transmission voltages can require significant earthworks. Given the context of the West Coast region, undergrounding is unlikely to be relevant in this instance.

7 Planning maintenance works

- 7.1 Transpower seeks to schedule its works, including any outages, to cause the least inconvenience to landowners and occupiers of land, industrial activity, and the public. However, this is not always possible, meaning that it is sometimes necessary to access lines at short notice, for example to restore a circuit after an unplanned outage.

8 Accessing and Clearing Work Areas

- 8.1 A clear working space and good access is required, particularly around the base of the support structures and in some cases under conductors, to move the plant and equipment in and set it up correctly. Cordons must be installed around the work site to minimise hazards and restrict access to everyone other than the trained work party. When work is carried out on a support structure, the effective work area for health and safety purposes includes the spans of conductor either side of that structure.
- 8.2 For some projects, such as wiring or where alterations are being made to structures, temporary hurdles or bypass lines may be required, or properties may need to be evacuated to protect against potential conductor drop hazards. Replacing a conductor is the time when the risk of conductor drop is greatest.
- 8.3 Figure 17 and Figure 18 below show hurdles established at a work site, including the space required, and their mid-span location. Hurdles are installed to protect traffic on access roads from risks associated with dropped conductors (mainly during re-

⁴ MAD refers to the minimum approach distance which the Electricity Code of Practice defines as the minimum approach distances in and around transmission structures and conductors to avoid flashovers.

stringing). Similar projects in urban and industrial developments have required the evacuation of residents or workers for periods of up to a week.



Figure 17: Typical hurdles installed to mitigate potential conductor drop during wiring.



Figure 18: More substantial hurdles installed to mitigate potential conductor drop during wiring.



Figure 19: Reconductoring in an urban setting

9 Maintenance work equipment

- 9.1 Depending on the type of maintenance work, the use of lifting machinery, stringing equipment, elevated work platforms or helicopters may be involved. Earth moving machinery, such as excavators or diggers, are required to expose or extract support structure foundations or carry out support structure refurbishment works.
- 9.2 For substantial works, a wide range of plant and equipment is sometimes necessary (see Figure 20 and Figure 21 below).



Figure 20: Removal of copper conductor



Figure 21: Crane being used for property rights to access new assets

10 Access for Planned Works

- 10.1 Transpower has:
- a statutory rights to access its assets on private land under the Electricity Act 1992 (**Electricity Act**). The Electricity Act provides for access to maintain, inspect and operate the National Grid; and
 - b in some cases, Contractual arrangements on private land.
- 10.2 In an ideal situation, Transpower would have unimpeded physical access to all transmission line structures. In practice, this is not always possible.
- 10.3 Physical barriers and natural obstacles, such as waterways, valleys, and undulating ground, require Transpower to use alternative access options, for example helicopters and/or walking in are sometimes required.
- 10.4 Intensive or sensitive development constitute additional physical barriers to accessing transmission line structures, increasing the costs and difficulties associated with gaining access.
- 10.5 The quality of access is important as some construction plant, for example cranes and concrete trucks, require wider and lower gradient tracks than what are traversable by smaller vehicles. The existing access is usually the most suitable as it was generally used to construct the line. If the landowner decides that they wish to change the access Transpower should be consulted to ensure that the new route will not impede future works on the Grid.
- 10.6 If the planning regime prevents the construction of fences and structures near the National Grid, this will avoid the need (and associated costs and delays) to dismantle fences and other structures, temporarily bridge waterways, carry out excavation or vegetation removal, just to access the National Grid.



Figure 22 Example crane access required for cross arm and insulator works

Access for Emergency Works

- 10.7 In the event of a fault (abnormal electrical condition), Transpower must always be able to quickly access its lines in order to find and fix the fault. Businesses and communities are heavily reliant on electricity, so it is crucial that faults are identified and fixed as soon as possible.
- 10.8 While Transpower's assets perform well in storm events or natural disasters, excessive winds and rivers changing course do at times break or collapse National Grid infrastructure and emergency repairs need to be carried out to get these back into operation. During these times there is often a heightened requirement for electricity. The National Grid is a lifeline utility⁵.

⁵ Under the Civil Defence Emergency Management Act 2002.

10.9 Suitable, agreed access routes are important so as to not delay the restoration of services.

Scheduling Electricity Outages for Maintenance Works

10.10 Live line work is sometimes possible, but there are restrictions on the types of activities that Transpower's workers can undertake while a line is live.⁶ Mid-span jointing, removing jumpers or conductors, lowering conductors to the ground for repairs, and some insulator replacements cannot be carried out while lines are live, either due to the nature of the work or due to restricted worker distances from live equipment. Live line work involves a highly trained work crew and requires the same access, work areas and crew numbers as the traditional de-energised work methods.

10.11 Scheduling outages for maintenance is much easier in districts where the planning framework discourages activities near the National Grid. This is because there are fewer activities impacted by the outage and the maintenance work, and there are likely fewer stakeholders with whom Transpower would engage to schedule an outage.

10.12 The majority of maintenance outages are scheduled 18-24 months in advance. This allows time to co-ordinate the outage with electricity generators and electricity distribution companies, while minimising disruption to end users.

10.13 Limited outage windows make it difficult to maintain certain parts of the National Grid, and therefore make it more likely that costly upgrades will be brought forward as parts wear out more quickly if they are not maintained.

Co-ordinating outages with all stakeholders

10.14 Arranging outages is a complex process. For Transpower to gain access to its electricity transmission lines, it works with all stakeholders to minimise the impact of the works on their activities. This includes:

- a Landowners – discussed in more detail below;
- b Maintenance contractors; and

⁶ In this context, 'line' generally refers to the whole transmission line (that is conductors and support structures). For double circuit lines (6 conductors) it is possible to have one circuit live and one dead. For single circuit lines (3 conductors) the line can only be switched on and off. The West Coast region has both single and double circuit lines.

- c Electricity generators, major electricity users and local lines companies – which have requirements with regards to transmission capacity, and security. These stakeholders must be able to manage electricity demand within the remaining available Grid capacity while work is being undertaken.
- 10.15 Transpower must follow an Electricity Authority Protocol for outages, which includes consultation.
- 10.16 Coordinating a scheduled outage ordinarily requires Transpower to engage with all affected landowners along the length of a transmission line for each outage.
- 10.17 Landowner access requirements vary, depending on the types of activities they undertake. Farming or industry landowner requirements can differ to those for residential activities, for example access to some farms during lambing is restricted. The more activities, in number and in type, undertaken under the transmission line, the more differing their requirements.
- 10.18 Transpower aims to accommodate landowner requirements. This can lead to the fragmentation of work on the electricity transmission line to accommodate individual landowner access requirements, and may result in more outages at various times. This is not always possible to accommodate, because of competing needs of generation, distribution, system security, demand and access.
- 10.19 An optimised solution, that could meet all third parties' needs and would enable work on transmission lines to proceed, would be for such activities to not be undertaken under the electricity transmission lines in the first place. The district's planning framework could require activities to be located away from electricity transmission lines. This is especially the case for those activities that cannot be easily shut down in case the site must be used for works, or if the activities are likely to have reverse sensitivity effects on the National Grid.

APPENDIX B – NZECP 34:2001 - PURPOSE AND LIMITATIONS

10.20 In this part of my evidence, I briefly comment on whether the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34:2001) is sufficient to address corridor management issues for the National Grid. While NZECP34:2001 is not raised by the reporting officer or submitters, I think it helpful to comment on NZECP34:2001 to provide context for the Panel and acknowledging the code is referenced in the National Grid corridor rules.

10.21 NZECP34:2001 serves an important purpose in prescribing minimum safe distances for the construction of buildings and structures, for the use of mobile plant, and for excavation near transmission line support structures and overhead lines. It does not address the wider third-party effects that compromise the National Grid, which are managed by the NPSET (discussed in detail earlier).

10.1 Compliance with NZECP34:2001 is mandatory, with compliance administered by the Ministry of Business, Innovation and Employment. Regulation 17(1)(a) of the Electricity (Safety) Regulations 2010 provide that:

A person who carries out any construction, building, excavation or other work on or near an electric line must maintain safe distances ... in accordance with ECP34.

10.1 Clause 2.4.1 of NZECP34:2001 states that:

Except with the prior written consent of the overhead electric line owner, no building or similar structure shall be erected closer to a high voltage overhead electric line support structure than the distances specified in Table 1"

10.2 NZECP34:2001 Table 1 states:

Minimum safe distances between buildings and overhead electric line support structures

Circuit Voltage	Pole	Tower (Pylon)
11kV to 33kV	2m	6m
Exceeding 33kV to 66kV	6m	9m
Exceeding 66kV	8m	12m

- 10.3 Therefore, in respect of circuits exceeding 66kV (i.e., Transpower's 110kV and 220kV lines), NZECP34:2001 requires that buildings must be at least 8m from a pole and 12m from a tower (noting there are no 220kV lines on the West Coast).
- 10.4 NZECP34:2001 also specifies minimum safe distances between conductors and buildings and other structures. These distances differ depending on the voltage of the line, and the length of the span between support structures. The tables within NZECP34:2001 are firstly based on generic and conservative span length envelopes. More detailed calculations can be undertaken to remove the conservatism. These detailed calculations require specialist engineering expertise. For spans longer than 350m, NZECP34:2001 would generally prevent the construction of buildings inside of the 12m Yard we propose.
- 10.5 Of importance, minimum safety requirements in NZECP34:2001 neither seek to protect the integrity of the National Grid from the effects of third parties, nor prevent development (including sensitive and intensive development) from occurring directly underneath transmission lines. As discussed above, such development can constrain operational and maintenance activities on lines.
- 10.6 Further, NZECP34:2001 does not adequately account for EPR hazard contours.
- 10.7 Clause 5 of NZECP34 specifies four metres as the minimum distance that must be kept between live overhead lines and any part of any mobile plant or load carried by that plant (without Transpower's prior written approval). In my experience, the four-metre distance is very difficult to monitor and enforce. Mobile plant operators such as forklift drivers, concentrating on the load they are carrying, may not look up and be aware of live conductors as low as 7 metres above the ground.
- 10.8 While NZECP34:2001 is a good base document for the determination of safe clearances, experience has found that the document is not well understood by the public. Even relatively sophisticated commercial entities often do not understand compliance requirements.,
- 10.9 Usually, Transpower's contractors will patrol every line and structure once a year. If an NZECP34:2001 violation is discovered, then the Transpower contractor will discuss this with the landowner and come back to check the problem has been rectified. If a regular patrol does not discover any minimum distance violations, a breach could occur the following week but may not be picked up until the next patrol (which could be a year later) This means that it can be very difficult to enforce the minimum distances in NZECP34:2001.

10.10 When considering the minimum vertical clearances, most people only consider the building in its finished form and do not consider the Health and Safety at Work implications of how the building is constructed or maintained.