

## SUBMISSIONS ON GIT

"Transmission Consultation Process"

M-co REPORT

(June 2004)

- (1) We have just become aware of the Report by M-co, setting out the Consultation processes to be adopted by the Commission.
- (2) The processes, as recommended, are fair and conscientious.
- (3) We regret that, due to the late disclosure to landholders of Transpower's intentions regarding its 400kV Grid Upgrade (Oct/Nov 2004), we were not in a position to consider any submissions regarding this report, and Transpower's actions subsequently.
- (4) We do not consider that the Report pays sufficient attention to the processes Transpower should adopt with regard to landowners' rights and the acquisition of Easements.
- (5) We are aware of Transpower's rights under the Public Works Act to obtain Easements by force if required. These rights were made quite plain to us at their Public Information Meeting of 7/11/04. In addition, Transpower have evolved a Standard Easement Agreement, which "will be used"
- (6) We do not regard Transpower's "Information Meetings" as Consultation within the terms of the M-co recommendations.
- (7) It was obvious to all participants that (a) Transpower had already decided on its course of action regarding line/tower type and route. The PR Company conducting the meeting were uninformed, and in some cases, downright misleading.
- (8) A Socio-Demographic Report on Residents along the Existing Power Line Routes prepared for Transpower reinforces the view that Transpower intend to proceed down these Routes again as the easy option.
- (9) We therefore submit that the public "Consultation" carried out so far by Transpower does not conform to the criteria set out in the M-co Report under "2.2 The Legal Requirements of Consultation."
- (10) We note also that Transpower may only propose Transmission Grid upgrades after demonstrating non-viability of Transmission Alternatives. We see no evidence that this has been done, especially for distributed generation. Transpower admits it is going ahead in the absence of generation- information.
- (11) The present 400kV AC proposal is no more than a stopgap measure resulting from cancellation of the 1988 S.I. to Auckland HVDC line. HVDC is more efficient over long distances than AC. There has been no mention of this alternative, either by landline or submarine cable.
- (12) The published illustrations of towers show outdated designs producing enormous visual desecration. There appears to be no consideration of modern, less obtrusive (and less expensive) tower designs (including "2-dimensional" towers)
- (13) We submit that the process, as so far carried out by Transpower, has been anything but transparent, and has all the subtlety of a steamroller, with the driver talking softly, but waving a very big stick.
- (14) We request therefore, that the Electricity Commission include our Society as an Affected Party in the Consultation Process, irrespective of any claims Transpower may make regarding its own "consultation" processes.