

ELECTRICITY COMMISSION DRAFT DECISION ON TRANSPOWER GRID UPGRADE PROPOSAL

Te Mana Taiao Environmental Trust

This submission is made by Te Mana Taiao Environmental Trust (“**TMT**”), whose role is to support its member marae on environmental issues. The TMT trustees are appointed by our member marae, which are in the South Waikato region.

TMT are affected by the Transower proposal because the proposed line runs directly through the rohe (traditional area) of one of our member marae (Pohara Pa). In particular:

- The mandate of Pohara Pa to act on behalf of Ngati Koroki Kahukura for Treaty of Waitangi issues was reconfirmed on 29 May 2005.
- The Ngati Koroki Kahukura rohe extends from Arapuni to Pukekura to the western side of Maungatautari to Puke Atua and then back to Arapuni.
- Pohara Pa and Pohara Urupa (cemetery, sited on Maungatautari 3A5J2) are an integral part of the spiritual and physical cultural identity of Ngati Koroki Kahukura. More than 30 Ngati Koroki Kahukura members live at Pohara Pa.
- Ngati Koroki Kahukura acknowledges that other hapu also claim tangata whenua status and have legal interests within our maunga (mountain), Maungatautari, and rohe.

Electricity Commission’s responsibilities

The Commission’s transmission responsibilities include:

- providing information to signal investment opportunities by preparing a “statement of opportunities”;
- developing “grid reliability standards” and a “grid investment test”; and
- consideration of grid investments proposed in a “grid upgrade plan”.

The essence of the GIT is that the Commission must be **reasonably satisfied** that a proposed grid investment delivers **the highest overall benefit to New Zealand** compared with alternative options. The benefits might include improved reliability, lower costs and fewer losses when transporting electricity.

Events to date

Transpower has proposed a 400kV transmission line from Whakamaru to Otahuhu (“**Proposal**”). The Commission’s draft decision is to not approve the Proposal, although it does invite comment on whether Transpower should seek to establish a transmission corridor, in order to:

- Preserve its options for future transmission upgrades; and,
- Provide landowners with certainty on the intended route of a future upgrade.

Our submission

We support the decision not to approve the Proposal, and reiterate our previous submission on this issue. In addition, this submission also addresses our specific concerns with the Draft Decision.

Our first concern is that the draft decision does not adequately analyse the cost of alternative routes. In particular, the draft decision states that “...*the Commission’s analysis of the representative Alternative Projects has assumed a generic route between Whakamaru and Otahuhu*”.

The proposed route is not generic. It cuts through the only communally owned land of the Pohara Marae people (Pohara Farm). It also cuts between the marae and the urupa (cemetery). It is clear that this existing route already has a direct impact on our people, our health/well being, our environment and our existing and future (farming & tourism) economic activities. This does not just impact on us ‘culturally’.

By failing to consider alternative routes, the Commission had not turned its mind to all of the relevant issues. Until the costs and benefits of alternative routes has been considered, the Commission is not in a position to approve the proposed transmission corridor. That analysis must take place **before** Transpower invests in obtaining the necessary consents and agreements to secure the Proposed Route

If Transpower were to invest in securing the Proposed Route, without an analysis of the costs and benefits of alternative routes, then this sunk cost will influence the ultimate decision on upgrade investment (at least in terms of route). It is cheaper to make use of land that Transpower already has consent for, than to undertake the same exercise for other land (an additional cost).

Our second concern is that the Commission process fails to provide for the particular concerns of Maori. We acknowledge that the Commission’s role is to focus on economic issues. However, the draft decision has not considered the specific economic consequences for Maori people and Maori land directly affected by the Transpower proposal. Again, we submit that the Commission cannot finalise its decision until that analysis has occurred.