

# Appendix A

## Summary of Submissions

## Appendix A - Summary of Submissions

| Statutory Submissions |                                  |   |                     |
|-----------------------|----------------------------------|---|---------------------|
| Submission Number     | Author                           | Comment   | Section Addressed   |
| 22004                 | Lismore Council                  | <p><b>Project Need, Justification and Alternatives:</b> The EA bases the need for this infrastructure on predicted increases in peak summer demands. However, instead of detailing how summer peak demands will be managed over the coming years, and/or how localised renewable energy sources could be developed with the assistance of TransGrid to meet this demand, TransGrid appears to simply take for granted a predicted 25% increase in energy demand.</p> <p>Lismore City Council strongly suggests that in preference to spending \$227 million on infrastructure, and the resulting 60m cleared easement through native vegetation, that this money be used to establish and implement a demand management strategy with Essential Energy for the Far North Coast and facilitate the development of a significant renewable energy Project in the Far North Coast. Issues to be considered in the development of these programs include:</p> <ul style="list-style-type: none"> <li>the evidence of a state wide decrease in electricity consumption of 2% per annum over the last 2 years,</li> <li>the anticipated further reduction in demand for carbon-based electricity due to carbon pricing legislation,</li> <li>the huge uptake of photovoltaics by people in this region, and preference for renewable sources of energy</li> <li>the lack of any current demand management strategy to reduce electricity consumption in this region</li> <li>latest research indicating that large scale photovoltaic energy generation will soon be at price parity with coal generated electricity (<a href="http://www.bloomberg.com">www.bloomberg.com</a>)</li> <li>the apparent lack of consideration of Metgasco's 30 MW gas powered electricity plant to help meet peak summer demand.</li> </ul> | 4.2.1.1             |
| 22004                 | Lismore City Council             | <b>Project Need, Justification and Alternatives:</b> Inadequate consideration has been given to alternatives to the Project. Inflation of anticipated usage growth figures and a lack of appreciation for the growth in uptake of renewables have led these inaccuracies.   | 4.2.1.1 and 4.2.1.2 |
| 22824                 | Inverell Shire Council           | No Objection  | N/A                 |
| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> All reasonable efforts must be made to avoid impacts to Aboriginal cultural heritage at all stages of the development works. If impacts are unavoidable, mitigation measures are to be negotiated with the local Aboriginal community and OEH. All sites impacted must have an OEH Aboriginal Site Impact Recording (ASIR) form completed and be submitted to OEH's AHIMS Registrar within 3 months of completion of these works.   | 4.7.1.1             |

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| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> An Aboriginal Cultural Education Program must be developed for the induction of all personnel and contractors involved in the construction activities on site. Records are to be kept of which staff/contractors were inducted and when for the duration of the Project. The program should be developed and implemented in collaboration with the local Aboriginal community  | 4.7.1.2           |
| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> If human remains are located in the event that surface disturbance occurs, all works must halt in the immediate area to prevent any further impacts to the remains. The NSW Police are contacted immediately. No action is to be undertaken until police provide written notification to the proponent. If the skeletal remains are identified as Aboriginal, the proponent must contact OEH's Enviroline on 131 555 and representatives of the local Aboriginal community. No works are to continue until OEH provide written notification to the proponent.  | 4.7.1.3           |
| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the object(s). The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) (managed by OEH) and the management outcome for the site included in the information provided to the AHIMS. The proponent will consult with the Aboriginal community representatives the archaeologist and OEH to develop and implement management strategies for all objects/sites. | 4.7.1.3.          |
| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> The proponent must continue to consult with and involve all the registered local Aboriginal representatives for the Project, in the ongoing management of the Aboriginal cultural heritage values. Evidence of this consultation must be collated and provided to the consent authority upon request.  | 4.7.1.4           |

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| Submission Number     | Author                           | Comment  | Section Addressed |
| 22807                 | Office of Environment & Heritage | <b>Indigenous Heritage:</b> The proponent must develop an Aboriginal Heritage Management Plan (AHMP) for the Project area to reflect the management outcomes for Aboriginal cultural heritage. The AHMP is to be developed and implemented in consultation with the registered Aboriginal stakeholders. The plan must include procedures for ongoing consultation and community involvement; details of the responsibilities of all stakeholders; details of proposed mitigation and management strategies of all Aboriginal sites; including any additional investigation processes proposed e.g. program of ground-truthing, any monitoring strategies, salvage activities, etc; procedures for the identification and management of previously unrecorded sites (excluding human remains); identification and management of any proposed cultural heritage conservation/relocation area(s); details of an appropriate keeping place agreement with local Aboriginal community representatives for any Aboriginal objects salvaged through the development process; include maps or plans identifying those areas subject to archaeological monitoring and salvage activities; detail protection measures for Aboriginal sites which will remain in situ within the Project area, to be protected in perpetuity; details of an Aboriginal cultural heritage education program for all contractors and personnel associated with construction activities; detail the current legislative requirements and environmental management standards follow recent legislative amendments; and compliance procedures in the unlikely event that non-compliance with the AHMP is identified. | 4.7.1.5           |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> DP&I should seek commitment to the collection/documentation of accurate records of specific habitat features and nesting resources that will be significantly impacted by this proposal, as inventoried during pre-clearance assessments (pp136-9). This information should be undertaken as part of a monitoring and compliance strategy and taken into account in the development of the proposed offset package. Unavoidable losses of such habitat features (if not already accounted for by any existing offset package) should be compensated for via further suitable offsets.   | 4.6.1.3           |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> DP&I should seek commitment to the collection/documentation of accurate records of threatened flora and its habitat that will be significantly impacted by this proposal, as part of a monitoring and compliance strategy. Unavoidable losses of threatened flora (if not already accounted for by any existing offset package) should be compensated for, possibly through translocation if appropriate, or via further suitable offsets that can demonstrate no net loss of threatened species and their habitat.   | 4.6.1.5           |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> The offset package should be developed based on quantitative understandings of losses and gains to biodiversity values. Given significant uncertainties about quantities and qualities of biodiversity assets that may need to be offset, there is a need to determine a strategy for managing information gaps in framing such an offset. Given the approach taken to identifying site specific attributes as the Project unfolds, offset negotiations would ideally be somewhat open-ended as specific cases arise with regard to threatened flora, fauna and associated habitat.   | 4.6.1.7           |

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| Submission Number     | Author                           | Comment   | Section Addressed  |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> The proponent should have due regard in developing its proposed offset package to use of OEH's Biobanking Assessment Methodology (BBAM) as a means of determining the nature and scale of impacts to be offset. (for discussion with OEH)  | 4.6.1.7            |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> In the case of avoiding impacts on (i.e. losses of) hollow bearing trees (and other habitat features), the application of a 'where practical' rule at this stage of the Project strengthens the need for a detailed inventory of habitat losses as proposed (Section 7, pp 138-9), which will not only inform the suite of on ground mitigation measures needed post approval, but the degree to which avoidance and mitigation is not feasible, and the means by which the proposed offset package might be framed. It also has implications for the development of monitoring, reporting, adaptive management and compliance issues. | 4.6.1.3            |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> Specific assessment of anticipated localised - impact is postponed until the Project is initiated on-ground. It is therefore difficult to calculate true impact and therefore any appropriate mitigation measures and/or offsets prior to approval.  | 4.6.1.2<br>4.6.1.8 |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> A more precautionary approach should be adopted in the selection of species for which "focused management controls" will be developed, expanding the current list from those species likely to be 'adversely' affected (under NSW AOS assessments) to also include any species deemed in the EA SIC (i.e. EPBC Act) assessments to be 'significantly' impacted (in Table 6.4, Appendix F, pp99-101), and/or any species listed as 'critically endangered' (regardless of AOC/SIC assessments).   | 4.6.1.2            |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> A suitably qualified ecologist with expertise in the landscapes within the Project area should be commissioned for any proposed pre-clearing surveys aimed at detecting the presence of threatened species, to maximise the potential identification of threatened flora. (OEH is concerned that only two threatened flora species were identified despite the large area covered in field surveys and by the easement).   | 4.6.1.4            |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> Assessments made using the EPBC Act Significant Impact Criteria (SIC) heads of consideration listed in summary form (in Tables 6.1 and 6.4) should be reviewed for consistency against detailed assessments (in Appendices I and J).   | 4.6.1.1            |
| 22807                 | Office of Environment & Heritage | <b>Biodiversity:</b> OEH appreciates and recognises that an effort has been made to provide and explain impact avoidance, and that a commitment has been made to undertake more developed pre-clearance surveys at later stages. However, given that post approval surveys are likely to increase knowledge of impacts to significant vegetation, species of habitat, OEH reinforces the need for the adoption of a precautionary or conservative approach to uncertainty in general, and specifically to the estimates provided for the clearing of potentially significant native vegetation.   | 4.6.1.8            |

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| Submission Number     | Author                                       | Comment  | Section Addressed |
| 22807                 | Office of Environment & Heritage             | <b>Biodiversity:</b> While the EA indicates that the easement route will generally avoid significant biodiversity assets, it should be noted that in several instances the easement cuts through important blocks of vegetation of high conservation value.  | 4.6.1.8           |
| 22809                 | NSW Rural Fire Service                       | <p><b>Hazard, Risk and Bushfire:</b> During construction work (on all lands associated with the Far North NSW Project, except managed lands) were cutting, grinding or welding of metal materials is to be undertaken:</p> <ul style="list-style-type: none"> <li>Construction crew and maintenance staff would be trained on basic first response fire fighting techniques including notification of fires and reporting.</li> <li>On all days of construction, 1,000 litres of fire fighting water, extinguishers, knap-sacks and rakehoes would be available on each construction site.</li> </ul> <p>All trained personnel would be provided personal protective equipment suitable for the fire activities.</p> | 4.12.1.1          |
| 22809                 | NSW Rural Fire Service                       | <b>Hazard, Risk and Bushfire:</b> On days of Total Fire Ban or days of Catastrophic Fire Danger days, 4WD striker unit(s), extinguishers, knap-sacks and rakehoes would be available to respond to any bushfire fire threat.   | 4.12.1.1          |
| 22809                 | NSW Rural Fire Service                       | <b>Hazard, Risk and Bushfire:</b> TransGrid (or the operating company) shall provide route/infrastructure plans, bushfire management plan and contact details to all District Fire Control Centres that the Project traverses through.   | 4.12.1.1          |
| 22816                 | Department of Primary Industries - Fisheries | <b>Surface Water and Hydrology:</b> By incorrectly classifying the value of certain waterways the current Project will result in unacceptable impacts on threatened species and significant fish habitats. As such the "Statements of Commitments" (C6 -C8) within the EA would not be achieved.   | 4.5.1.1           |
| 22816                 | Department of Primary Industries - Fisheries | <p><b>Surface Water and Hydrology:</b> DPI Fisheries has significant concerns that the Project, as outlined in the EA, will result in barriers to fish passage being installed or maintained within the known habitat of threatened fish species.</p> <p>The 'Statements of Commitments' C6, C7 and C8 within the EA are considered inadequate in addressing these issues. It is recommended that the preferred Project report include a classification of waterways using the Fairfull and Witheridge (2003) waterway classification and also include a description of the specific crossing type proposed at each site. These amendments should be made in consultation with DPI Fisheries.</p>                    | 4.5.1.4           |

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| Submission Number     | Author                                       | Comment  | Section Addressed  |
| 22816                 | Department of Primary Industries - Fisheries | <b>Surface Water and Hydrology:</b> Many of the waterways classified as “unlikely fish habitat” within the EA contain in-stream aquatic vegetation, a defined channel and generally permanent pools. Using the Fairfull and Witheridge (2003) classification some of these waterways would be considered Class 1 or 2, major or moderate fish habitat, respectively. In addition, some of the waterways classified as “unlikely fish habitat” within the EA are known habitat for threatened fish species; Purple Spotted Gudgeon ( <i>Mogurnda adspersa</i> ), Agassizi’s Glassfish ( <i>Ambassis agassizi</i> ) and Eel Tailed Catfish ( <i>Tandanus tandanus</i> ). Using the Fairfull and Witheridge (2003) classification waterways that form the habitat of a threatened fish species are categorised as Class 1 waterways.  | 4.5.1.1            |
| 22816                 | Department of Primary Industries - Fisheries | <b>Surface Water and Hydrology:</b> This submission notes that “The EA does not specify the nature and scope of works to be undertaken at each particular waterway crossing, rather, broad categories are used to describe the works required.” The department recommends several conditions of approval to address these issues.<br><br>DPI Fisheries recommends the soil and water management plan prepared as part of the ‘Statement of Commitments’ (B4) incorporate the preparation, by an appropriately qualified person, of site specific erosion and sediment control plans for each crossing location. Effective implementation of sediment and erosion controls requires site specific knowledge and DPI Fisheries consider this appropriate due to the potential for sediment and erosion impacts on threatened fish species. DPI Fisheries recommend that this intent be incorporated into the ‘Statement of Commitments’. | 4.5.1.2<br>4.5.1.3 |
| 22816                 | Department of Primary Industries - Fisheries | <b>Surface Water and Hydrology:</b> where waterway crossings are proposed, the EA does not apply the habitat classification scheme provided in Fairfull and Witheridge (2003), instead using a modified version with three rather than four categories.<br><br>DPI Fisheries believes the classification used in the EA does not accurately reflect the fish habitat value of the sites and the upstream waters. This is particularly the case for sites known or likely to have threatened species present.   | 4.5.1.1            |
| 22816                 | Department of Primary Industries - Fisheries | <b>Biodiversity:</b> All waterway crossings (new and upgraded) must comply with the FM Act and government policy and be designed so as to adequately allow for the free passage of fish.   | 4.6.1.12           |
| 22816                 | Department of Primary Industries - Fisheries | <b>Biodiversity:</b> Many of the waterways classified as “unlikely fish habitat” within the EA contain in-stream aquatic vegetation, a defined channel and generally permanent pools. Using the Fairfull and Witheridge (2003) classification, some of these waterways would be considered Class 1 or 2, major or moderate fish habitat, respectively.   | 4.6.1.10           |

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| 22816                 | Department of Primary Industries - Fisheries | <b>Biodiversity:</b> Where waterway crossings are proposed, the EA does not apply the habitat classification scheme provided in Fairfull and Witheridge (2003), instead using a modified version with three rather than four categories. DPI Fisheries believes the classification used in the EA does not accurately reflect the fish habitat value of the sites and the upstream waters. This is particularly the case for sites known or likely to have threatened species present. By incorrectly classifying the value of certain waterways the current proposal will result in unacceptable impacts on threatened species and significant fish habitats. As such the “Statements of Commitments” (C6 – C8) within the EA would not be achieved. | 4.6.1.10          |
| 22816                 | Department of Primary Industries - Fisheries | <b>Biodiversity:</b> Some of the waterways classified as “unlikely fish habitat” within the EA are known habitat for threatened fish species; Purple spotted Gudgeon ( <i>Mogurnda adspersa</i> ), Agassizi’s Glassfish ( <i>Ambassis agassizi</i> ) and Eel Tailed Catfish ( <i>Tandanus tandanus</i> ). Using the Fairfull and Witheridge (2003) classification, waterways that form the habitat of a threatened fish species are categorised as Class 1 waterways.   | 4.6.1.11          |
| 22818                 | NSW office of Water                          | <b>Soils Geology and Topography:</b> As a precautionary approach, NOW recommends that the CEMP should include a management plan for any acid sulphate soils identified during construction.   | 4.4.1.1           |
| 22818                 | NSW office of Water                          | <b>Surface Water and Hydrology:</b> Licence and approval requirements apply to some dams. The proponent must consult with NOW to ensure that the taking of water from any artificially constructed dam for the proposed Project is appropriately authorised.  | 4.5.1.6           |
| 22818                 | NSW office of Water                          | <b>Surface Water and Hydrology:</b> NOW provides draft conditions of consent that include a requirement for watercourse crossings to be designed in consultation with NOW so as to maintain the geomorphic stability of the watercourse.  | 4.5.1.4           |
| 22818                 | NSW office of Water                          | <b>Surface Water and Hydrology:</b> The EA fails to identify that the <i>Water Sharing Plan for the Richmond River Area Unregulated, Regulated and Alluvial Water Sources 2010</i> applies to part of the proposed Project in the Richmond River Catchment Area. The EA also fails to identify that the <i>Water Sharing Plan for the NSW Border Rivers Unregulated and Alluvial Water Sources</i> and the <i>Water Sharing Plan for the NSW Murray-Darling Basin Fractured Rock Groundwater Sources</i> are due to commence in the near future (early 2012) and will apply to part of the proposed Project in the Border Rivers Catchment Area.  | 4.5.1.7           |
| 22818                 | NSW office of Water                          | <b>Surface Water and Hydrology:</b> The EA should have assessed the potential impact of the proposed Project on Gibraltar Springs and Basket Swamp as the closest groundwater dependent ecosystem to the Project.   | 4.5.1.8           |
| 22818                 | NSW office of Water                          | <b>Surface Water and Hydrology:</b> the proponent must consult with NOW to ensure that dewatering for any footing structure is appropriately authorised under the relevant water legislation.   | 4.5.1.6           |

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| 22820                 | Northern Rivers Catchment Management Authority       | <b>Soils, Geology and Topography:</b> Minimise soil loss and disturbance from the site and associated access tracks during construction and post construction.  | 4.4.1.2           |
| 22820                 | Northern Rivers Catchment Management Authority       | <b>Surface Water and Hydrology:</b> The submission notes that the Environmental Assessment acknowledges the Northern Rivers Catchment Action Plan (CAP)(2006). The submission recommends that soil, water, flora and fauna management practices be implemented to achieve the following outcomes: "Minimise disturbance of riparian zones particularly at river and creek crossings to ensure river and creek bank stability ..."   | 4.5.1.5           |
| 22820                 | Northern Rivers Catchment Management Authority       | <b>Biodiversity:</b> Minimise disturbance of riparian zones particularly at river and creek crossings to ensure river and creek bank stability.   | 4.6.1.9           |
| 22820                 | Northern Rivers Catchment Management Authority       | <b>Biodiversity:</b> Minimise the clearing of native vegetation and habitat along the route to reduce the impact on the area's biodiversity values.   | 4.6.1.9.          |
| 23772                 | Crown Lands (DPI)                                    | Crown Lands does not object in principle to the Project as outlined in the EA   | N/A               |
| 23772                 | Crown Lands (DPI)                                    | <p>we request that TransGrid consult directly with Crown Lands prior to determination of the application by Planning to discuss the following:</p> <ul style="list-style-type: none"> <li>Proposals to acquire land and/or other interests in the Crown estate under the Land Acquisition (Just Terms Compensations) Act 1991</li> <li>Possible requirement for a preconstruction licence prior to acquisition to authorise occupation of Crown land not covered under the Electricity Supply Act 1995 for activities such as easement investigations and survey</li> <li>Future governance arrangements of Crown public roads used in conjunction with on-easement and/or off-easement access tracks</li> <li>Any utilisation of other Crown land for off-easement access</li> </ul> <p>Details of Crown tenure holders, Reserve Trusts and public road closing applications in train to allow appropriate notification, consultation and negotiation with affected stakeholders</p> | N/A               |
| 22830                 | Border Rivers- Gwydir Catchment Management Authority | <b>Biodiversity:</b> GPS reference points should be provided at a more detailed scale during the Construction Process to more accurately represent location and extent of ecologically significant areas and individual species   | 4.6.1.9           |
| 22830                 | Border Rivers- Gwydir Catchment Management Authority | <b>Biodiversity:</b> The Border Rivers – Gwydir CMA reiterates the need to disseminate mitigation measures relating to limiting the spread of weeds and limiting soil erosion during the construction and maintenance phases of this development to all contractors and others Mechanisms for doing this should be stipulated in detail prior to the next phase of design.  | 4.6.1.9           |

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| 21948                    | TAG Inc | <b>Noise and Vibration:</b> Submission noted inevitable noise impacts which would arise from the Project  | 4.10.2.1           |
| 21948                    | TAG Inc | <b>Project Justification and Alternatives:</b> Calculations indicate that the annualised cost of constructing the power line may be between 9 and 20 times higher than non-network alternatives (solar PV, combined cycle gas, energy efficiency and peak load management), Also the UTS report shows that there are various alternative power generation sources that have not been adequately assessed, these include a Metgasco 30 MW gas power station in Casio and a Red Sky Energy 27MW Gas Power Station, The Summerland Way Power Project.  | 4.2.2.4<br>4.2.2.5 |
| 21948                    | TAG Inc | <b>Project Justification and Alternatives:</b> There is a need for much clearer explanation why TransGrid 's reports indicate the amount of network support required at 2016/17 is 61 MW when on the basis of previous TransGrid reports the need would amount to between 22 MW and 49 MW, with the possibility that only 13 MW support is required.  | 4.2.2.6            |
| 21948                    | TAG Inc | <b>Project Justification and Alternatives:</b> TransGrid must show that its methodology and processes demonstrate best practice and that there is compliance with all regulatory requirements as laid out in the Australian Energy Regulator's 2010 Report. The most notable omissions are included below. <ul style="list-style-type: none"> <li>the application notice did not contain an adequate analysis of all reasonable network and non-network options;</li> <li>neither the application notice nor the final report adequately examined the potential for material inter-network impacts;</li> <li>the final report did not summarise or respond to submissions on the application notice; and</li> <li>the decision to limit the analysis to a single reasonable scenario was inadequately justified.</li> </ul> | 4.2.2.3            |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> Submission point 1 states that TransGrid 's stated need is inaccurate – there are discrepancies in the level of stated supply capacity in 2016/17 (See ISF Report 2011).  | 4.2.2.6            |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> There are several alternatives, including non-network options, that could be implemented that would meet the required supply capacity these could be implemented incrementally to meet demand as required.  | 4.2.2.5            |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> TransGrid has overestimated the level of network support required (for summer peak demand - the greater network constraint identified by TransGrid ) and that there are inconsistencies in TransGrid 's estimates among different TransGrid documents (See ISF Report 2011).  | 4.2.2.6            |

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| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> An examination of the cost of non-network options (solar PV, combined cycle gas, energy efficiency and peak load management) to provide network support at levels of 22 MW to 61 MW shows that these are considerably cheaper than the proposed Project. "This is primarily because the non-network options can be implemented incrementally up to the level of network support required. Non-network options not only address the need for network capacity but have the additional benefit of also reduc(ing) the need for new centralised power station capacity elsewhere in NSW. Some of these non-network options also assist in reducing greenhouse gas emissions." (See ISF Report 2011).  | 4.2.2.4           |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> Submission point 2 states that TransGrid have not satisfied the requirements of the AER – Specifically clause 5.6.6 of the National Energy Rules (NER) (see AER Report, 2010).<br>Specifically: <ul style="list-style-type: none"> <li>• clause 5.6.6 (c)(iii) by failing to provide a detailed description of all other reasonable network and non-network alternatives</li> <li>• clause 5.6.6(h) by failing to summarise the submissions received from interested parties and Trans Grid's response to each submission</li> <li>• neither the application notice nor the final report adequately examined the potential for material inter-network impacts, (clauses 5.6.6(c)(5) and 5.6.6(d))</li> <li>• the final report did not summarise or respond to submissions on the application notice (clause 5.6.6(h))</li> </ul> the decision to limit the analysis to a single reasonable scenario was inadequately justified (regulatory test version 3, paragraph 19) and thus did not meet the requirement for the application notice to set out a detailed analysis of why the regulatory test was satisfied or, alternatively, if the asset satisfied the regulatory test as a reliability augmentation, why the asset was a reliability augmentation (clause 5.6.6(6)). | 4.2.2.3           |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> The Request for Proposals (RfP) in May 2010 does not satisfy the NER. The RfP issued by TransGrid did not seek alternatives to the construction of the Dumaresq to Lismore line. It did not give potential providers of alternatives to the construction any opportunity to submit such alternatives.  | 4.2.2.2           |
| 21948                    | TAG Inc | <b>Project Needs, Justification and Alternatives:</b> There are several alternatives, including non-network options, that could be implemented that would meet the required supply capacity these could be implemented incrementally to meet demand as required.   | 4.2.2.5           |
| 21948                    | TAG Inc | <b>Visual Assessment:</b> There are inevitable implications on visual amenity  | 4.8.2.1           |

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| 21948                    | TAG Inc (Australian Energy Regulators (AER) Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “To assure stakeholders that there is no systemic bias against the consideration of non-network solutions, the AER sought further evidence from TransGrid of similar processes that allowed reasonable non-network solutions to be described in the final report and, where applicable, included in the regulatory test assessment. TransGrid did not respond to this request. This area will be a particular focus of the AER in future compliance assessments. In addition, the AER expects this issue to be addressed by TransGrid in future.”  | 4.2.2.5           |
| 21948                    | TAG Inc (AER Investigation Report)                                | <b>Project Needs, Justification and Alternatives:</b> ‘The reproduction of text from the application notice draws into question the report’s status as a “final” document. While this may have been true of the application notice, (which made the same statement), the final report should have presented the results of the consultation.’  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report)                                | <b>Project Needs, Justification and Alternatives:</b> “Accordingly, on this occasion, the AER has decided that the appropriate response on this issue is to: <ul style="list-style-type: none"> <li>• seek commitments from TransGrid to improve future compliance</li> <li>• publish this public investigation report</li> <li>• commit 10 future audits of clause 5.6.6 processes. “</li> </ul> Refer to AER Investigation Report for other outcomes and commitments from TransGrid .  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report)                                | <b>Project Needs, Justification and Alternatives:</b> “Despite the requirements of clause 5.6.6(c)( I )(iii) to describe all reasonable network and non-network alternatives to address the identified constraint, the application notice did not describe the sorts of non- network alternatives that would address the emerging network limitation. Further, TransGrid did not provide sufficient detail in its public documents to support its conclusions on the inappropriateness of some options. For example, the AER was provided with internal TransGrid planning documents that considered a range of broader options that were not published as part of the application notice. The AER notes that during its investigation, TransGrid has provided further information on its assessment of options. The AER considers that much of this information should have been in the application notice. “ | 4.2.2.5           |

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| Submission Number        | Author                             | Comment   | Section Addressed |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “Further, TransGrid has noted that its assessment of the materiality of any internetwork impact was not set out in the application notice. However, TransGrid contend that it was not a requirement of clause 5.6.6 that a detailed assessment be set out in the application notice. Whilst clause 5.6.6(c)(5) of the Electricity Rules is unclear whether TransGrid was required to provide a detailed assessment of the materiality of any inter-network impact in its application notice, the AER considers that TransGrid’s approach falls well short of best practice and is counter to the intent of an open and transparent process envisaged by clause 5.6.6.”  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “In addition, TransGrid also contends that even if there was likely to be a material inter-network impact (by the Project), an augmentation technical report would not have been required as it had received consent to proceed with the construction of the line.” However, the AER does not consider that the correspondence between TransGrid and Powerlink constitute consent to the construction of the asset as required by clause 5.6.6(c)(5)(iii) -as they refer exclusively to comments on the application notice and final report, with no mention of construction of the asset.  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “In regard to the requirements of clause 5.6.6(c)(i)(iii), the AER considers that at least some of the previously non-public information set out in this recent RFP (May 2010), should have been included in the application notice, such as: <ul style="list-style-type: none"> <li>• Potential (but not exhaustive) types of possible non-network solutions</li> <li>• Geographic location for network support</li> <li>• Magnitude of network support required</li> <li>• Timing, duration and frequency for which the service would be required.</li> </ul> It is this kind of information that would have assisted in making the 5.6.6 and regulatory test process conducted by TransGrid more transparent and competitively neutral as between network and non-network options. The final report should then have assessed the network options on the same footing as any non-network options that had been proposed, leading to a firm statement on which option minimises the costs and thereby passes the regulatory test. “ | 4.2.2.3           |

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| Action Group Submissions |                                    |   |                   |
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| Submission Number        | Author                             | Comment   | Section Addressed |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “In some cases, TransGrid ruled out options on the basis that it would be difficult to obtain an easement. However, difficulty in obtaining easements is not uncommon with new transmission line developments. The AER considers that further explanation and justification is required over and above a simple statement on the likely difficulty in obtaining easements. Without this further analysis, decisions to dismiss an option on such a basis lack transparency and cannot be independently tested.” The AER considers that TransGrid is required to detail all reasonable network and non-network alternatives, regardless of whether there is a proponent for these options. TransGrid has accepted that more detailed information could have been included in the application notice.   | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “The AER considers that the Electricity Rules required that TransGrid undertake an analysis to determine the impact on other networks and then assess the materiality of any impact with regard to the criteria above. TransGrid has not provided evidence that this analysis occurred. Rather, TransGrid has simply stated that there is no material inter-network impact and as a result no augmentation technical report was required.”  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “The AER does not consider that TransGrid’s references to the expectations of the NSW jurisdiction or the statutory requirements on a distribution business meets the requirements of clause 5.6.6(c)(1)(ii). Whilst TransGrid did not admit a breach of the Electricity Rules in this area, it did recognise that more information could have been set out in the application notice to further enable assessment of alternative non-network options.”   | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “TransGrid has accepted that “its approach to, and analysis of, determining the number and characteristics of any reasonable scenario was not set out in detail in the Application Notice or Final Report.” TransGrid contends that this was not a requirement of clause 5.6.6. However, the AER disagrees with TransGrid’s interpretation or the requirements in this clause. Clause 5.6.6(c)(6) requires a detailed analysis of why the applicant considers that the asset satisfies the regulatory test and, where the applicant considers that the asset satisfies the regulatory test as a reliability augmentation, analysis of why the applicant considers that the asset is a reliability augmentation..... TransGrid had a requirement to detail why it considered that the asset satisfied the regulatory test by explaining the matters set out in the previous paragraph in detail. Accordingly, the AER considers that the failure to provide a detailed analysis in relation to the reasonable scenarios is contrary to the requirements of clause 5.6.6(c)(6) of the Electricity Rules.” | 4.2.2.3           |

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| Submission Number        | Author                             | Comment  | Section Addressed |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “TransGrid has committed to reporting on its new compliance systems to ensure future compliance with the new clause 5.6.6 and RIT-T processes. Given the importance of high quality information on the impact on power transfer capability for the efficient functioning of the market, the AER will give further consideration to the adequacy of the information disclosure required in this area.”  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> “TransGrid 's reference to a lack of formal documentation highlights a serious deficiency in the process conducted by TransGrid . Poor quality information can have significant ramifications for other market participants, who rely on operational and planning publications by network operators for the purposes of their operational and investment decisions.”   | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> In relation to clause 5.6.6(h), that the final report summarise submissions and TransGrid 's response to each submission...”TransGrid argued that the submissions did not raise realistic options. However, clause 5.6.6(h) does not require that submissions meet any particular standard. Rather, it just requires that all submissions be summarised and responded to. TransGrid 's final report did not meet this requirement. Without admitting a breach in this area, TransGrid has recognised that more information could have been provided in the final report on the submissions received. “   | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> While TransGrid did conduct a needs analysis, the AER is concerned that it did not provide sufficient information to enable a prospective provider of non-network alternatives to formulate a proposal. TransGrid relied on prospective proponents requesting further information regarding the service that would be required to defer the preferred network option.  | 4.2.2.3           |
| 21948                    | TAG Inc (AER Investigation Report) | <b>Project Needs, Justification and Alternatives:</b> The AER has found shortcomings in the process conducted by TransGrid in reaching its decision to build the line. Key areas of concern are that: <ul style="list-style-type: none"> <li>the application notice did not contain an adequate analysis of all reasonable network and non-network options</li> <li>neither the application notice (April 2008) nor the final report (March 2009) adequately examined the potential for material inter-network impacts</li> <li>the final report did not summarise or respond to submissions on the application notice</li> </ul> the decision to limit the Regulatory Test analysis to a single reasonable scenario was inadequately justified and did not meet the requirement to provide a detailed description on why TransGrid consider the asset passed the Regulatory Test. | 4.2.2.3           |

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| Submission Number        | Author  | Comment  | Section Addressed |
| 21948                    | TAG Inc (Institute for Sustainable Futures, University of Technology Sydney (ISF, UTS)) | <p><b>Project Needs, Justification and Alternatives:</b> “Annual demand growth has fallen significantly since TransGrid submitted their final report on their proposal to build a power line from Lismore to Dumaresq (TransGrid 2009), in which they Projected an increase of 97 MW in peak demand over a five year planning horizon, and identified a need for network support of 62 MW. TransGrid has not revised their estimates of the network support to correspond to the reduction in demand growth. While the five year Projected growth in peak demand has fallen to 49 MW, the identified need for network support at the five year planning horizon is essentially the same, namely 61 MW.</p> <p>Assuming TransGrid is currently meeting reliability standards, there is no apparent reason why the need for network support would be greater than the Projected increase in demand in the next five year planning horizon, namely either the 49 MW Projection for growth in the Environmental Assessment, (TransGrid 2011c) or the 22 MW identified in the 2011 Annual Planning Report (TransGrid 2011b).”</p> | 4.2.2.6           |
| 21948                    | TAG Inc (ISF, UTS)  | <p><b>Project Needs, Justification and Alternatives:</b> “ISF examined the non-network options to provide network support at levels of 22 MW to 61 MW, and found that the cost of non-network options is considerably lower than the proposed new 330 kVA power line from Dumaresq to Lismore. This is primarily because the non-network options can be implemented incrementally up to the level of network support required. ISF’s calculations found the annualised cost of constructing the power line may be between 9 and 20 times higher than non-network alternatives, depending on how much network support is actually required. This comparison did not seek the optimum (least cost) mix of non-network alternatives, which is likely to include more energy efficiency.”</p>  | 4.2.2.4           |
| 21948                    | TAG Inc (ISF, UTS)  | <p><b>Project Needs, Justification and Alternatives:</b> The Institute for Sustainable Futures reviewed TransGrid’s presentation of options to meet the identified need for network support within the five year planning horizon (2016/17). on the basis of this review, it appears that, TransGrid does not fulfil the requirements of the regulatory test because:</p> <ul style="list-style-type: none"> <li>• Most reasonable options to meet the identified need for network support are not properly explored, with costs only proposed for construction of two alternative transmission lines.</li> <li>• The strengthening of Directlink is not explored as a transmission network option.</li> <li>• The two options put forward, for construction of 200 -300 km of 330 KVA powerlines are likely to be the highest cost options to meet the identified need for network support of between 22 MW and 61 MW.</li> </ul> <p>Non network options to meet the need for network support are likely to be between 9 times and 20 times cheaper than the construction of the power line.</p>                            | 4.2.2.4           |

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| Submission Number        | Author       | Comment   | Section Addressed |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Key Threatening Processes (KTPs) are generally poorly dealt with. Those relevant under the <i>Fisheries Management Act</i> have not been addressed even though the Project involves the upgrade of 17 water crossings and the installation of 25 new crossings. KTP relevant to the Project include: Degradation of native riparian vegetation along NSW water courses, and Removal of large woody debris. | 4.6.2.2           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Many key threatening processes are overlooked – particularly those listed under the FM Act, and regarding water crossings and fish management.   | 4.6.2.2           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> For many species the focus of the assessments is along the eastern alignment even though they are equally as likely to occur along the western alignment.  | 4.6.2.3           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> For many species the focus of the assessments is along the eastern alignment even though they are equally as likely to occur along the western alignment.  | 4.6.2.3           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Determination of vegetation stratification units has not used existing and appropriately scaled vegetation mapping of the western alignment. Believe that Keith's vegetation classification is too broad.  | 4.6.2.5           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Determination of vegetation stratification units has not used existing and appropriately scaled vegetation mapping of the western alignment. Believe that Keith's vegetation classification is too broad.  | 4.6.2.5           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> It doesn't appear that in determining stratification units URS have made use of existing and more appropriately scaled vegetation mapping of the western alignment or numerous NPWS reports in and around this area.   | 4.6.2.5           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Insufficient time was spent mapping vegetation communities.  | 4.6.2.5           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Dry Rainforest is a regionally significant vegetation community which is commonly found in disjunct patches in sheltered gullies along the western alignment. This regionally significant community should have been targeted in searches as it is habitat for a number of threatened flora species.   | 4.6.2.8           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> The biodiversity survey effort falls short of the requirements of the DEC 2004 survey guidelines and may go part way to explaining the very low number of flora species identified   | 4.6.2.8           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> The biodiversity survey effort falls short of the requirements of the DEC 2004 survey guidelines and may go part way to explaining the very low number of flora species identified   | 4.6.2.8           |

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| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> While the use of a 20m x 20m (0.04ha) quadrat is acceptable for general vegetation survey, it is not consistent with DEH 2006 (now SEWPaC) guideline for the identification of the Critically Endangered Ecological Community (CEEC) - White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grasslands.                                  | 4.6.2.8           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> While the use of a 20m x 20m (0.04ha) quadrat is acceptable for general vegetation survey, it is not consistent with DEH 2006 (now SEWPaC) guideline for the identification of the Critically Endangered Ecological Community (CEEC) - White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grasslands.                                  | 4.6.2.8           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Dry Rainforest should have been targeted in searches as it is habitat for a number of threatened flora species in the western section   | 4.6.2.8           |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Two Rare or Threatened Australian Plants (RoTAP) species were identified as present on the Project area, <i>Eucalyptus youmanii</i> and <i>Discaria pubescens</i> . Although of conservation significance neither species are identified as such in the report and no assessment of the potential impact of the Project on these species has been undertaken. | 4.6.2.10          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Two RoTAP species ( <i>Eucalyptus youmanii</i> and <i>Discaria pubescens</i> ) were identified within the Project area, however no mention of their conservation significance or potential impacts of the Project has been undertaken.  | 4.6.2.10          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> No assessment of impacts is possible until all vegetation along the proposed easement is mapped accurately, including areas of non-native vegetation such as cultivated areas.  | 4.6.2.11          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> The Assessment is dependent on the development and implementation of various management plans and as such is an inappropriate document to assess the Project.   | 4.6.2.11          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> An adequate assessment of the impact of this Project can only be made when the impacted vegetation is identified and its landscape context understood. In the absence of this information no reliable assessment regarding the impact of the Project can be made.   | 4.6.2.11          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> The submission states that many serious items within the AOS/SIC are overlooked.  | 4.6.2.12          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Within the S5A (AOS in the report) and EPBC (SIC in the report) assessments many of the potentially serious and deleterious impacts of the proposed transmission line are simply overlooked   | 4.6.2.12          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Coolatai Grass has been wrongly identified as a noxious weed in Table 5.4 of the report.  | 4.6.2.1           |

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| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | TAG Inc      | <p><b>Biodiversity:</b> Submission point 3 states that there are several inaccuracies within the Biodiversity report. These include the following:</p> <ul style="list-style-type: none"> <li>• inadequate vegetation mapping which has left large sections of the Project area unmapped</li> <li>• inappropriate survey effort which has potentially underestimated the area of critically endangered and endangered ecological communities and threatened species present on the Project area</li> <li>• unexplained paucity of survey findings</li> <li>• failure to identify a number of vegetation communities found on the Project area as comprising endangered ecological communities</li> <li>• failure to identify <i>Bothriochloa biloba</i> found on the Project area as a threatened species</li> <li>• omission of a significant number of ecological communities and threatened species from survey and assessment that potentially occur on the Project area</li> <li>• a flawed assessment of the major impacts associated with the Project including habitat loss and fragmentation and loss of essential habitat components (eg tree hollows, feed trees).</li> </ul> | 4.6.2.13          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> Report has a variety of deficiencies which make it inadequate for approval authorities to assess the impact of development.   | 4.6.2.13          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> <i>Swamp Sclerophyll Forest</i> – is incorrectly assessed. The report's reasoning is also inconsistent with DECC 2007 assessment guidelines which require the impact to be assessed at a local scale. The assessment gives no indication of the size of the local occurrence to be impacted.  | 4.6.2.16          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> A number of threatened species likely to occur or have habitat within the Project area have been omitted from assessment  | 4.6.2.14          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> There is a lack of acknowledgement about the paucity of records which leads to further inaccuracies in the report.  | 4.6.2.14          |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> The Swamp Sclerophyll Forest - is incorrectly assessed - DECC 2007 assessment guidelines require the impact to be assessed at a local scale.  | 4.6.2.16          |

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| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | TAG Inc      | <b>Biodiversity:</b> There are a number of inconsistencies between the fauna survey effort as stated and the results presented. "There are a number of inconsistencies between the fauna survey effort as stated and the results presented. "The poor survey results are of concern, as is the failure of the report to acknowledge the paucity of records. This along with the inconsistencies in the survey effort described and survey maps throw severe doubt on the effectiveness of the survey. It is our opinion the results of this survey are at best inadequate and at worst unreliable for effective impact assessment. "   | 4.6.2.15          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> There are a number of inconsistencies between the fauna survey effort as stated and the results presented, these include: <ul style="list-style-type: none"> <li>Anabat - 1008 hours over 8 nights - this is probably a typo, but if not and even presuming 12 hour of darkness, the maximum effort that could be achieved is 96 hours. Even so for 8 nights of Anabat survey over 200 km of habitat, only 9 microbat species were identified and only one apparently in grassy woodland. A very poor result.</li> <li>According to the report 10 hours were spent frogging but only two frog species appear to have been recorded in the species list under Aves.</li> <li>Hair Tubes - Inconsistencies exist between the stated methodology, the reports and the results.</li> </ul> Habitat Searches – according to the report, 30 hours of habitat searches were undertaken. The number of species discovered in the time is not consistent with expectations for habitat of this type. | 4.6.2.9           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Coolatai Grass is wrongly identified as a noxious weed in Table 5.4 of the report. This species is not listed as noxious under legislation.   | 4.6.2.1           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Key Threatening Processes (KTPs) are poorly addressed. Those relevant under the Fisheries Management Act have not been addressed despite the need for an upgrade of 17 water crossings and the installation of 25 new crossings. KTPs relevant to the Project include: <ul style="list-style-type: none"> <li>Degradation of native riparian vegetation along NSW water courses, and</li> <li>Removal of large woody debris.</li> </ul>   | 4.6.2.2           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Report focuses on assessing impacts in the eastern alignment although they may also occur in the western alignment. Examples of affected species and populations include; Glossy Black Cockatoo, Squirrel Glider, Regent Honeyeater, Black-chinned Honeyeater, Painted Honeyeater, Tusked Frog and Bush-stone Curlew.   | 4.6.2.3           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Amount of time spent on vegetation community mapping seems minimal given the length of the Project area, and significant variation in terrain elements, elevation, geology and climate.   | 4.6.2.5           |

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| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Areas along the proposed transmission line have not been mapped even though they appear to support vegetation. Polygons do not fully cover patches.   | 4.6.2.5           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Box Gum Woodland (TSC Act and EPBC Act) may have been underestimated due to the exclusion of the Inland Grey Box Grassy Woodland and Rough-barked Apple Riparian forb/grass open forest communities. Consequently, the area of Box Gum Woodland to be impacted needs to be reassessed | 4.6.2.6           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Inadequate vegetation mapping which has left large sections of the Project area unmapped  | 4.6.2.13          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Inappropriate survey effort which has potentially underestimated the area of critically endangered and endangered ecological communities and threatened species present on the Project area.  | 4.6.2.13          |

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| Submission Number        | Author       | Comment   | Section Addressed |
| 21948                    | EnviroFactor | <p><b>Biodiversity:</b> Omission of threatened ecological communities and species from survey and/or assessment including:</p> <ul style="list-style-type: none"> <li>Bothriochloa biloba (vulnerable EPBC Act); identified as a dominant species within some communities. No mention in the report of its status, distribution or abundance and no assessment of impacts.</li> <li>Montane Peatlands; review of SPOT imagery indicates potential to occur in Project area. This community was not targeted during survey and no assessment of potential impacts have been undertaken.</li> <li>Upland Wetlands; this community should have been targeted in searches (as per Montane Peatlands).</li> <li>Carex Sedgelands – not listed as a TEC during initial survey but was on public exhibition during August 2010. Field work was on-going in September 2010 - as such, this community should have been included in the survey and assessment. Review of SPOT imagery indicates areas of community towards the north and east of Tenterfield, within the Project area.</li> <li>New England Peppermint Woodlands on Basalts and Sediments; the New England Peppermint / Fuzzy Box community identified in the Project area may constitute this TEC. Clearing for roads and powerlines has been identified as a threat to this community, yet it has not been identified or assessed within the report.</li> <li><i>Monotaxis macrophylla</i>; found in the Tenterfield area but excluded from survey and assessment. One of a number of threatened flora species that are likely to occur but have been excluded.</li> <li><i>Boronia repanda</i> - excluded due to its occurrence on rock outcrops. Report includes a number of other rock outcrop endemics. The largest known population of <i>Boronia repanda</i> occurs in a valley and is not associated with any rock outcropping or platforms, it should therefore be included in the assessment.</li> <li><i>Pomaderris queenslandica</i>; occurs in moist eucalypt forest and sheltered woodlands and has a scattered distribution across the Northwest Slopes, New England Tablelands and North Coast. Although difficult to survey for it is likely to occur on the Project area.</li> <li><i>Capparis canescens</i>; although only known from one population near Bonshaw this species should have been targeted in searches as other populations may potentially occur within the Project area.</li> </ul> | 4.6.2.7           |
| 21948                    | EnviroFactor | <p><b>Biodiversity:</b> Possible mis-identification of woodland areas dominated by what are referred to as Eucalyptus chloroclada (Dirty Gum) and Eucalyptus microcarpa (Inland Grey Box). Do not believe that large/extensive areas of woodlands dominated by these species would occur within Project area. However, if the identification is correct, the occurrences of these associations would be of regional significance.</p>   | 4.6.2.7           |

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| Submission Number        | Author       | Comment   | Section Addressed |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Report appears to exclude a number of species (flora and fauna) from assessment due to a lack of database records in the vicinity of the Project area. This appears to be particularly true for the western alignment. Lack of records is likely to be due to lack of survey, hence few records. Precautionary principle should be used; if habitat is present then the species should be assessed.  | 4.6.2.7           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Stratification appears not to have been extended much beyond the broad vegetation types as outlined by Keith (2004). As such, the degree of sampling required has been underestimated.   | 4.6.2.5           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> The use of a 20m x 20m (0.04ha) quadrat is not consistent with DEH 2006 (now SEWPaC) guidelines for the identification of the Critically Endangered Ecological Community (CEEC) - Box Gum Woodland. The guideline specifies the use of a 20m x 50m quadrat (0.1ha) which may increase the number of groundcover species identified, and therefore the likelihood of an area to meet EPBC Act listing criteria for the CEEC. Consequently, it is possible the flora survey has underestimated the area of the CEEC within the Project area. | 4.6.2.8           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Dry Rainforest, a regionally significant vegetation community should have been targeted in searches as it is habitat for a number of threatened flora species.   | 4.6.2.8           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Survey effort does not meet DEC 2004 survey guidelines and may go part way to explaining the low number of flora species identified. 82 20m x 20m quadrats from within 49 identified vegetation communities equates to less than 2 sites per community and indicates a lack of replication.  | 4.6.2.8           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Unexplained paucity of survey findings.  | 4.6.2.13          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Anabat – 1008 hours over 8 nights– this is probably a typo but if not, and even presuming 12 hours of darkness, the maximum effort that could be achieved is 96 hours. Even so for 8 nights of Anabat survey over 200kms of habitat only 9 micro-bat species were identified and only one apparently in the grassy woodlands, a very poor result. The report states that 22 sites were surveyed but the maps appear to show only 6 sites and with only one survey site located along the western alignment.                                | 4.6.2.9           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Fauna survey inconsistencies; 10 hours were spent frogging but only two frog species have been recorded (under Aves (Birds)). No obvious frog sites appear on the survey location maps. No mention is made in the report of this obviously poor result given the Project area lies within country known for its rivers, creeks wetlands and soaks.   | 4.6.2.9           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> call playback – only one site appears to have been surveyed along the western alignment near Tenterfield.  | 4.6.2.9           |

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| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> habitat searches – report states 30 hours of habitat searches were undertaken, however, only seven reptile species (6 lizards and 1 snake) were recorded, and of these all except one are medium to large reptiles readily observed at a distance. Missing are any number of small terrestrial and fossorial lizards, snakes and geckoes commonly found under fallen logs, surface rock and bark during habitat searches in the type of country that occurs across the Project area. Again a very poor result of which no mention is made in the report. No habitat search sites are recorded on the survey maps. | 4.6.2.9           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> hair tubes – report states 170 tubes over 10 days, but according to the methodology 20 tubes were laid per transect and 2 transects were positioned in each vegetation formation except for 1. Based on these figures the effort should have been 20 tubes x 2 transects x 6 formations = 240 tubes. In contrast the survey maps appear to indicate 16 hair tube transects which would equate to 320 tubes. Clarification is required.  | 4.6.2.9           |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Two ROTAP species were identified as present in the Project area; Eucalyptus youmanii and Discaria pubescens. Neither species is identified as ROTAP in the report and no assessment of the impacts has been undertaken.  | 4.6.2.10          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Need to know the full extent and landscape context of the vegetation to be impacted before an accurate assessment of impacts can be made.   | 4.6.2.11          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> An adequate assessment of the impact of this Project can only be made when the impacted vegetation is identified and its landscape context understood. In the absence of this information no reliable assessment regarding the impact of the Project can be made.   | 4.6.2.11          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> AOS and SIC assessments; fragmentation is poorly dealt with. The report states clearing along the eastern alignment will not impact on populations of threatened species because the vegetation is already highly fragmented. This argument overlooks the impacts small areas of clearing can have in fragmented landscapes. Impacts include local species extinctions, as habitat blocks become too small to support populations and larger habitat gaps prevent species from moving across the landscape to access alternate habitat resources (food, breeding sites and mates).                                | 4.6.2.12          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> no explanation as to why the loss of tree hollows will not impact on local populations of threatened hollow dependant species e.g. Turquoise Parrot, Nyctophilus timoriensis and Little Lorikeet.   | 4.6.2.13          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Submission comments that the biodiversity report acknowledges that the Project will fragment habitat relevant to koalas and native mice, potentially creating two or more populations from what is now one. Why this is not considered significant in the report remains a mystery.   | 4.6.2.12          |

## Appendix A - Summary of Submissions

| Action Group Submissions |              |  |                   |
|--------------------------|--------------|--|-------------------|
| Submission Number        | Author       | Comment  | Section Addressed |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> SICs and AOSs are poorly executed and inconsistent. At least one species listed under both the TSC Act and EPBC Act has two opposing outcomes (significant and not significant). Tables 6.1, 6.2 and 6.4 in this report are inconsistent.   | 4.6.2.12          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Assessment consistency with DECC 2007 guidelines.<br>Outcomes of assessments are inconsistent with the DECC 2007 guideline; should be significant or not significant. Report uses None, Potential or Adverse.   | 4.6.2.13          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> A number of threatened species likely to occur or with habitat in the Project area have been omitted from assessment; <ul style="list-style-type: none"> <li><i>Anomalopus mackayi</i> – is likely to occur towards the west edge of the Project area and should be assessed.</li> <li><i>Chalinolobus picatus</i> – is likely to occur towards the western edge of the Project area and should be assessed.</li> <li><i>Furina dunmalli</i> – is likely to occur towards the western edge of the Project area and should be assessed.</li> <li><i>Litoria booroolongensis</i> – may occur in Project area and should be assessed.</li> <li><i>Oedura rhombifer</i> – may occur on the Project area and should be assessed.</li> <li>Stripe-faced Dunnart – may potentially occur in the Bonshaw area and should be assessed.</li> </ul> Eastern Cod – occurs in the Clarence catchment with records west of Lismore so should be included in the assessment. | 4.6.2.14          |
| 21948                    | EnviroFactor | <b>Biodiversity:</b> Contradictions between results and assessments: <ul style="list-style-type: none"> <li>The report states that vegetation clearing will increase the ability of foxes to access remnant areas (e.g. AOS for woodland birds). However, the SIC for the Quoll states that the Project won't contribute to the spread of foxes.</li> <li>Field survey results show that <i>V. troughtoni</i> (Eastern Cave Bat) was 'possibly' recorded and the species is listed in the fauna survey results yet AOS states that this species was not identified during survey.</li> </ul> The report states that <i>Dichanthium setosum</i> was 'detected during field surveys conducted within the broader study area' implying it was not found within the transmission line easement but contradicts this statement later with 'the species was found in fairly constricted locations within the easement and study area'  | 4.6.2.15          |

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| Action Group Submissions |                                   |  |                   |
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| Submission Number        | Author                            | Comment  | Section Addressed |
| 21948                    | EnviroFactor                      | <b>Biodiversity:</b> Swamp Sclerophyll Forest – incorrectly assessed. The report states this is a widespread community within NSW, hence Project impact will not be significant. Inaccurate; community has a wide geographical distribution, but occurrences are patchy and highly disjunct. 2,500ha of this community are believed to remain in the Clarence Valley. Report rationale is inconsistent with DECC 2007 assessment guidelines which require the impact to be assessed at a local scale. The assessment gives no indication of the size of the local occurrence to be impacted. | 4.6.2.16          |
| 21932                    | Mingoola Progress Association Inc | <b>Noise and Vibration:</b> The noise and dust from the machinery working to build the line will be extreme, and will affect not only those people living closer to it, but also on windy days many others as well. It will also upset animals grazing close to it.  | 4.10.2.1          |
| 21932                    | Mingoola Progress Association Inc | <b>Noise and Vibration:</b> The noise and dust from the machinery working to build the line will be extreme, and will also upset animals grazing close to it.  | 4.10.2.1          |
| 21932                    | Mingoola Progress Association Inc | <b>Surface Water and Hydrology:</b> “TransGrid also contends that there are no areas of flood plain affected by the line which we know to be untrue (Beardy, Reedy Creek and Mole Rivers). In the January 2011 floods large trees and power poles were picked up like match sticks. TransGrid has not properly planned for such a contingency.”  | 4.5.2.1           |
| 21932                    | Mingoola Progress Association Inc | <b>Visual Assessment:</b> “The present line (Westlink) is clearly visible from over 10km, and our tourism businesses which heavily rely on the beautiful and untouched nature of our scenery will be negatively impacted by the line. Indeed, some of us report that our regular paying guests have expressed with regret that they would not be coming if the line were there. “  | 4.8.2.1           |
| 21932                    | Mingoola Progress Association Inc | <b>Visual Assessment:</b> “The uglification of the landscape is one of the most pressing issues to our organisation. Views will be impacted and scars formed on the landscape as a result of the building of the line and access roads. Those of us who have moved here in order to escape urban landscapes are particularly distressed by the Project. “  | 4.8.2.1           |
| 21932                    | Mingoola Progress Association Inc | <b>Visual Assessment:</b> “We object to the URS assessment of visual amenity and levels of impact on the grounds that the methodology used is based on subjective assessment, and cannot accurately reflect the opinions of people looking at a line. For some people, a view with a line in it may not be distasteful. For others, including our members, any view with a line in it is unacceptable”.  | 4.8.2.2           |

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| Submission Number        | Author                             | Comment  | Section Addressed    |
| 21932                    | Mingoola Progress Association Inc. | <b>Consultation:</b> “Consultation with landowners has been perfunctory, and in some cases promises have been made which have not been kept about the siting of the line. Consultation has in many cases been accompanied by an implied threat that if landowners do not comply they will in some way be negatively impacted. We object on the grounds of inadequate consultation according to the Director General’s Requirements.” | 4.3.2.1              |
| 21932                    | Mingoola Progress Association Inc. | <b>Consultation:</b> “The Planning Authority requires consultation with all affected parties, not just those who own land on the easement. This process has not taken place with members who own land adjacent, or with members who rent, live or work on a property affected.”  | 4.3.2.2              |
| 22639                    | Upper Dumaesq Environment Network  | <b>Air Quality and Greenhouse Gas:</b> Noise and dust during the construction phase and future maintenance stages are very concerning to those living within and adjacent to the easement.   | 4.11.2.1<br>4.10.2.2 |
| 22639                    | Upper Dumaesq Environment Network  | <b>Consultation:</b> “Many people have objected to the high handed way in which they were dealt with. Some feel they have been harassed, and others feel that they have been subjected to undue pressure to sign an agreement, before the Project has been verified”   | 4.3.2.1              |
| 22639                    | Upper Dumaesq Environment Network  | <b>Consultation:</b> “Some people who are neighbours of the easement have never been consulted, and feel they will be affected in a number of ways, and there are no provisions within the Project to compensate them for the negative effects they will experience.”  | 4.3.2.2              |
| 22639                    | Upper Dumaesq Environment Network  | <b>EMF:</b> A ‘policy of prudent avoidance’ is not deemed acceptable response in relation to the expressed concern, fear and uncertainty over EMF related health effects. In addition there is no clarity as to what ‘a prudent policy of prudent avoidance’ includes.   | 4.13.2.1             |
| 22639                    | Upper Dumaesq Environment Network  | <b>Hazard Risk and Bushfire:</b> The absence of an integrated Disaster Management Plan at this stage of a Project is totally unsatisfactory.   | 4.12.2.1             |
| 22639                    | Upper Dumaesq Environment Network  | <b>Hazard Risk and Bushfire:</b> The increased likelihood of bushfires as a result of a high voltage power line is a major contention.   | 4.12.2.2             |
| 22639                    | Upper Dumaesq Environment Network  | <b>Noise and Vibration:</b> It does not appear that the noise caused through the construction phase will in fact comply with permissible and acceptable noise standards.   | 4.10.2.2             |
| 22639                    | Upper Dumaesq Environment Network  | <b>Noise and Vibration:</b> Noise and dust during the construction phase and future maintenance stages are very concerning to those living within and adjacent to the easement.  | 4.11.2.1<br>4.10.2.2 |

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| Action Group Submissions |                                    |  |                      |
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| Submission Number        | Author                             | Comment  | Section Addressed    |
| 22639                    | Upper Dumaresq Environment Network | <b>Noise and Vibration:</b> The submission states that it does not appear that the noise caused through the construction phase will in fact comply with permissible and acceptable noise standards.  | 4.10.2.2             |
| 22639                    | Upper Dumaresq Environment Network | <b>Project Needs, Justification and Alternatives:</b> It is very likely that the building of the line would negatively impact on the competitiveness of the renewable energy industry in the region, and threaten jobs in this much needed industry.   | 4.2.2.5              |
| 22639                    | Upper Dumaresq Environment Network | <b>Project Needs, Justification and Alternatives:</b> There is strong evidence that electricity demand is actually reducing not increasing   | 4.2.2.6              |
| 22639                    | Upper Dumaresq Environment Network | <b>Project Needs, Justification and Alternatives:</b> We cannot understand why a Project which costs so much more than the other options identified in the report by the Institute for Sustainable Futures could be approved.  | 4.2.2.4              |
| 22639                    | Upper Dumaresq Environment Network | <b>Socio Economics:</b> Imposing such unnecessary psychological, social and economic stress on a rural community at this time and in the circumstances, namely that there is independent expert evidence that the Project is in fact not required at all, would be irresponsible of any Government | 4.15.2.1             |
| 22639                    | Upper Dumaresq Environment Network | <b>Socio Economics:</b> The Compensation offered has been very poor, and does not reflect the real value of properties.  | 4.14.2.2             |
| 22639                    | Upper Dumaresq Environment Network | <b>Socio Economics:</b> The Project will affect the burgeoning eco-tourism and winery industry in the more remote areas affected by the proposed easement  | 4.14.2.3             |
| 22639                    | Upper Dumaresq Environment Network | <b>Socio Economics:</b> the Project will lead to a massive loss in property values   | 4.14.2.1             |
| 22639                    | Upper Dumaresq Environment Network | <b>Socio Economics:</b> The TransGrid valuers have not valued property owners' properties for future land use or subdivisions, something which it ought to take into account   | 4.14.2.1<br>4.14.2.2 |
| 22639                    | Upper Dumaresq Environment Network | <b>Traffic and Transportation:</b> Concerns have been also raised as to the dangers posed by a substantial increase in traffic on the Bruxner Highway, which is not, as stated in the Environmental Assessment, an RTA road.   | 4.9.2.1<br>4.9.2.2   |
| 22639                    | Upper Dumaresq Environment Network | <b>Visual Assessment:</b> "Concerns have been raised over the significant impact that the Project will have aesthetically on the landscape. Currently much of the proposed easement is a classic unmarked rural landscape."  | 4.8.2.1              |

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|--------------------------|------------------------------------|--|-------------------|
| Submission Number        | Author                             | Comment  | Section Addressed |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> The AER's decision not to require TransGrid to address breaches in code was based on incorrect information regarding the need for the Project and the possible alternatives.   | 4.2.2.5           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> The amount of network support identified in the EA is not justified in the light of current Projections (ISF report, p 3-7):   | 4.2.2.6           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> The construction of the transmission line is not the least cost alternative to meet the identified network constraint. A combination of energy efficiency, peak load management, and solar PV could meet the network support required at much lower cost within the Projected time frame (ISF report, p 10-12):  | 4.2.2.4           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> The decision to limit the analysis to a single reasonable scenario was inadequately justified (regulatory test version 3, paragraph 19) and thus did not meet the requirement for the application notice to set out a detailed analysis of why the regulatory test was satisfied or, alternatively, if the asset satisfied the regulatory test as a reliability augmentation, why the asset was a reliability augmentation (clause 5.6.6(6)). (AER Investigation Report, p 20) | 4.2.2.3           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> The RfP is an inadequate document upon which to base any conclusions about alternatives to the construction of the line (EA, section 2.3.4). The RfP issued by TransGrid in 2010 did not seek alternatives to the construction of the Dumaresq to Lismore line.  | 4.2.2.2           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> there is no justification for why the network support required rises from nothing in 2015/16 to 61 MW in 2016/17, while peak demand is forecast to grow by less than 10 MW in that year. (ISF report, p 7)   | 4.2.2.6           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> TransGrid's presentation of alternatives and options (EA, section 2.4) is inadequate and at odds with available evidence (ISF report, p.15-16).  | 4.2.2.5           |
| 22639                    | Upper Dumaresq Action Group        | <b>Project Needs, Justification and Alternatives:</b> TransGrid's Projections have not fully accounted for a number of proposals and potential Projects which would materially affect any shortfall e.g. Red Sky Energy 27MW gas station, Metgasco 30MW gas station, PV installations, (ISF report, p 10-11).  | 4.2.2.5           |
| 22639                    | Upper Dumaresq Environment Network | <b>Other:</b> Imposing such unnecessary psychological, social and economic stress on a rural community at this time and in the circumstances, namely that there is independent expert evidence that the Project is in fact not required at all, would be irresponsible of any Government.  | 4.15.2.1          |

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| Action Group Submissions |  |  |                   |
|--------------------------|--|--|-------------------|
| Submission Number        | Author                                 | Comment  | Section Addressed |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> Concern over potential impacts resulting from impacts to grassy woodlands on three threatened species in particular: <ul style="list-style-type: none"> <li>• Brush-tailed Rock Wallaby</li> <li>• Squatter Pigeon</li> <li>• Turquoise Parrot</li> </ul>   | 4.6.2.4           |
| 22639                    | Upper Dumaresq Action Group            | <b>Biodiversity:</b> There has been inadequate vegetation mapping which has left large sections of the Project area unmapped.  | 4.6.2.13          |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> For Box Gum Woodland the probable underestimation of the area of this community, for the reasons outlined in our report, make it likely this Project will have a greater impact on the extent and condition of this EEC and CEEC than indicated in the URS report. The underestimation of this community is an important shortfall in the biodiversity report   | 4.6.2.6           |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> In regards to Box Gum Woodland, many of the areas conform to the minimum condition criteria, using a quadrat 60% smaller than that than required by SEWPaC for identification of the CEEC (ie 0.04ha instead of 0.1ha), which is likely to mean that their actual condition is better than stated within the biodiversity report, and as such, may mean that the biodiversity report has underestimated the amount of some communities. | 4.6.2.6           |
| 22639                    | Upper Dumaresq Action Group            | <b>Biodiversity:</b> Omission of a significant number of ecological communities and threatened species from survey and assessment that potentially occur on the Project area.  | 4.6.2.13          |
| 22639                    | Upper Dumaresq Action Group            | <b>Biodiversity:</b> Failure to identify a number of vegetation communities found on the Project area as comprising endangered ecological communities  | 4.6.2.13          |
| 22639                    | Upper Dumaresq Action Group            | <b>Biodiversity:</b> There was an inappropriate survey effort which has potentially underestimated the area of critically endangered and endangered ecological communities and threatened species present on the Project area.   | 4.6.2.13          |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> The Environmental Assessment does not deal satisfactorily with the threats to threatened species. The Envirofactor Report states (on p10):<br>"Within the S5A (AOS in the report) and EPBC (SIC in the report) assessments many of the potentially serious and deleterious impacts of the proposed transmission line are simply overlooked for example  | 4.6.2.12          |

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| Action Group Submissions |                                       |   |                   |
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| Submission Number        | Author                                | Comment   | Section Addressed |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> the impacts that the proposed Project will have on biodiversity, particularly listed threatened species, populations and communities and matters of national environmental significance are unknown, as the URS Biodiversity Report is so inadequate.                                  | 4.6.2.13          |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> The assessment as presented in the URS Biodiversity Report has a variety of deficiencies which make it inadequate for approval authorities to effectively assess the impact of this development.   | 4.6.2.13          |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> The assessment of the Dumaesq to Lismore 330kV Transmission Line as presented in the URS Biodiversity Report has, in our opinion, a variety of deficiencies which make it inadequate for approval authorities to effectively assess the impact of this development.                    | 4.6.2.13          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b> The biodiversity report, prepared by the proponent, is drastically inadequate  | 4.6.2.13          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b> No explanation is tendered as to why the loss of tree hollows as a result of this Project will not impact on local populations of threatened species dependent upon hollows for breeding and roosting such as the Turquoise Parrot, <i>Nyctophilus timoriensis</i> and Little Lorikeet | 4.6.2.13          |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> Failure to identify <i>Bothriochloa biloba</i> found on the Project area as a threatened species   | 4.6.2.13          |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> There is an unexplained paucity of survey findings   | 4.6.2.14          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b> There is an unexplained paucity of survey findings   | 4.6.2.14          |
| 22639                    | Upper Dumaesq Action Group            | <b>Biodiversity:</b> Flawed assessment of the major impacts associated with the Project including habitat loss and fragmentation and loss of essential habitat components (eg tree hollows, feed trees).  | 4.6.2.13          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b> The species lists for a number of communities are somewhat depauperate, this includes many of the various communities which comprises the CEEC   | 4.6.2.15          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b><br>It is judged that the Project will fragment habitat of Koalas and native mice, potentially creating two or more populations from what is now one. Why this is not considered significant in the report remains a mystery.   | 4.6.2.12          |
| 22639                    | The Upper Dumaesq Environment Network | <b>Biodiversity:</b> The impact of fragmentation is poorly dealt with within the Biodiversity report.   | 4.6.2.12          |

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| Action Group Submissions |  |   |                     |
|--------------------------|--|---|---------------------|
| Submission Number        | Author                                 | Comment   | Section Addressed   |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> Species which live in the habitat to be cleared can't simply move into what habitat remains, as the habitat that remains will already be occupied. It is also highly unlikely that the resident fauna will readily share limited feeding and breeding resources with the clearing refugees                 | 4.6.2.17            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> The independent authors of the Envirofactor report suggests that the proponent underestimates the impacts that the transmission line will have on biodiversity.  | 4.6.2.18            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> Until a Biodiversity Offset Strategy is developed no effective assessment of this Project can be made by an approval authority.  | 4.6.2.20            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> Even with an offset provided, the reality is that in the short to medium term, there is a net loss ie areas of the EEC / CEEC are cleared.   | 4.6.2.19            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> In the case of Box-Gum Woodland less than 10% is estimated to remain nationally in all its various conditions. It is therefore questionable whether the removal of any further areas of this community can be adequately offset.   | 4.6.2.19            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> In the time lag between the clearing and when the offset area finally achieves similar habitat values to those lost (for hollow-bearing trees 140 years or more) local species extinctions will occur, particularly in fragmented habitats.  | 4.6.2.19            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> the absence of the various environmental management plans upon which mitigation of the Project impacts are contingent makes an assessment of the impacts of the Project difficult.   | 4.6.2.20            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> The deficiencies in the Biodiversity report should be enough to suggest as a minimum a new round of surveys.   | 4.6.2.20            |
| 22639                    | The Upper Dumaresq Environment Network | <b>Biodiversity:</b> Using a decision made by the federal Environment Minister on another Project as precedence, the submission states that the Project should not go ahead as the "likely economic and social benefits of this Project do not outweigh the serious environmental impacts on our nationally protected species." | 4.2.2.1<br>4.6.2.13 |

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| Public Submissions |               |   |                               |
|--------------------|---------------|---|-------------------------------|
| Submission Number  | Author        | Comment   | Section Addressed             |
| 20521              | Peter Woodrow | <b>Air Quality and Greenhouse Gas:</b> The evaluation of the emissions does not account for the built emissions associated with the production of materials used to construct and subsequently operate the transmission line  | 4.11.3.1                      |
| 20521              | Peter Woodrow | <b>Other:</b> On page 4 of the ES the Project cost is quoted at \$227 million, on page 12 at 210 million and in their most recent community publication \$270 million. It beggars belief that after a 3 year delay and the imposition of the new cost of an \$18-20 million dollar substation at Tenterfield that the price could actually drop. Even at this level the unprofessional and imprecise planning is apparent.  | 4.15.3.2                      |
| 20521              | Peter Woodrow | <b>Project Needs, Justification and Alternatives:</b> The EA does not adequately address the need for the Project. Specifically, The EA has not taken any account of the impact of non-network options prior to its initial Project as mandated by section 5.6.6. the National Electricity Rules.   | 4.2.3.5                       |
| 20521              | Peter Woodrow | <b>Project Needs, Justification and Alternatives:</b> The submission states the following inadequacies of the TransGrid process that were identified by AER 2010 Report: <ul style="list-style-type: none"> <li>the application notice did not contain an adequate analysis of all reasonable network and non-network options</li> <li>neither the application notice (April 2008) nor the final report (March 2009) adequately examined the potential for material inter-network impacts</li> <li>the final report did not summarise or respond to submissions on the application notice</li> </ul> the decision to limit the Regulatory Test analysis to a single reasonable scenario was inadequately justified and did not meet the requirement to provide a detailed description on why TransGrid consider the asset passed the Regulatory Test. | 4.2.3.3<br>4.2.3.4<br>4.2.3.5 |
| 20521              | Peter Woodrow | <b>Project Needs, Justification and Alternatives:</b> The Terranora connector is clearly the cheapest option despite ownership issues. Also the I-Grid Report clearly stated that infrastructure spending is the most expensive option and that Smart-metering and demand management of the Far North coast is the single most cost effective strategy.   | 4.2.3.4                       |
| 20521              | Peter Woodrow | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's predicted energy demands are based upon population growth, rather than actual energy usage, which has according to TransGrid 's own documentation declined or remained flat. The submission states that TransGrid using old Projection data in the Project justification when it has newer (2011 data) showing over a 100 to 150MW decrease in demand Projections.   | 4.2.3.5                       |
| 20521              | Peter Woodrow | <b>Socio Economic:</b> The proposed transmission line will have detrimental impacts on both the land-value and tourism industry in the community.   | 4.14.3.1<br>4.14.3.2          |
| 20521              | Peter Woodrow | <b>Socio Economics:</b> The Project costing does not reflect the reduced value of assets in the vicinity of the proposed transmission line  | 4.14.3.1                      |

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| Public Submissions  |                                   |  |                      |
|---------------------|-----------------------------------|--|----------------------|
| Submission Number   | Author                            | Comment  | Section Addressed    |
| 20521               | Peter Woodrow                     | <b>Biodiversity:</b> <i>"The proposed route for the transmission lines through the Tenterfield region will impact dramatically on a number of indigenous fauna and flora listed as environmentally significant. In particular the proposed route will impact on the Conservation of EPBC Act listed communities White Box, Blakely's Red Gums, Orange Gums, Lyrebirds and Koalas."</i> | 4.6.3.3              |
| 20521               | Peter Woodrow                     | <b>Biodiversity:</b> The proposed route will impact on the Conservation of EPBC Act listed communities White Box, Blakely's Red Gums, Orange Gums, Lyrebirds and Koalas.   | 4.6.3.3              |
| 21481, 21483, 21485 | Name Withheld of Chapel Hill, QLD | <b>Project Needs, Justification and Alternatives:</b> The EA does not adequately justify the need it insists it has. It is also running against current environmental practices by the use of coal fired power   | 4.2.3.5              |
| 21481, 21483, 21485 | Name Withheld of Chapel Hill, QLD | <b>Traffic and Transportation:</b> The EA does not adequately assess the impact of unauthorised access to properties along the alignment through the new access tracks.  | 4.15.3.5             |
| 21540               | John Rodwell                      | <b>Other:</b> Objects to this Project  | N/A                  |
| 21590, 21592, 21618 | Ruth Matthews of Moree            | <b>Other</b> Her parents that live in Bonshaw are suffering from increased anxiety as a result of the Project  | 4.15.3.1             |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>EMF:</b> The EA does not adequately address the issue of health effects on farmers of their associated stock.   | 4.13.3.2<br>4.14.3.7 |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>Project Needs, Justification and Alternatives:</b> The EA does not adequately justify the needs for the Project. Specifically the Project's compliance with the Australian Energy Regulator (AER).  | 4.2.3.5<br>4.2.3.3   |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>Socio Economics:</b> Health impacts on farmers and livestock  | 4.13.3.1<br>4.13.3.2 |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>Socio Economics:</b> Land values will diminish.   | 4.14.3.1             |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>Socio Economics:</b> The Project is causing stress related health problems to residents.  | 4.15.3.1             |
| 21590, 21592, 21618 | Ruth Matthews of Moree,           | <b>Biodiversity:</b> There could be ecological impacts from the Project.   | 4.6.3.1              |

## Appendix A - Summary of Submissions

| Public Submissions |                              |   |                   |
|--------------------|------------------------------|---|-------------------|
| Submission Number  | Author                       | Comment   | Section Addressed |
| 21620              | Mark Hesse of Piora, NSW     | <b>Visual Assessment:</b> Degree and nature of visual impact at individual property<br>The submission disagrees with the assessment in the EA that the impact of the replacement of the existing 132kV line with the 330kV line will be negligible.   | 4.8.3.2           |
| 21620              | Mark Hesse of Piora, NSW     | <b>Visual Impact:</b> The Project involves replacing the existing wooden 132Kv pole with a much larger 330 Kv Angle Position steel tension structure 140 m from the property of the submission's author.<br>The submission suggests that a more suitable angle position structure could be designed at this location as the angle is only 22 degrees.<br>The submission states that consultation with Darryl Henry of TransGrid has been engaged and that options are available to lessen the visual impact at this location (115 Ellems Bridge Road, Piora).   | 4.8.3.3           |
| 21715              | John Rodwell                 | <b>Project Needs, Justification and Alternatives:</b> The latest estimates (from TransGrid 's 2011 Planning Report) indicate that peak demand increases are now less than 50% of the increases used by TransGrid in 2008 to justify the Project. The Project is insufficiently justified within the EA. If peak demand grew according to TransGrid 's new modelling, there are cheaper, cleaner and more efficient ways to deal with it than the out-dated and expensive construction of a transmission line. But peak demand across Australia is actually falling (5% - 6% e.g. see <a href="http://theconversation.edu.au/powering-down-has-australian-electricity-consumption-hit-its-peak-3044">http://theconversation.edu.au/powering-down-has-australian-electricity-consumption-hit-its-peak-3044</a> ). | 4.2.3.5           |
| 21715              | John Rodwell                 | <b>Project Needs, Justification and Alternatives:</b> The requirements of the AER have not been met by the applicant. fails to comply with Section 5.6.6 on two counts: <ul style="list-style-type: none"> <li>it was not part of the original application and was only initiated after the AER began an investigation into TransGrid 's application</li> <li>it was issued to cater for the unexpected delay in Project delivery, not to explore alternatives to the line's construction. The RfP dealt only with short term solutions to peak demand; it did not seek alternatives to the construction of the line and denied prospective providers any opportunity to submit alternatives.</li> </ul>  | 4.2.3.3           |
| 21720              | Name Withheld of Tenterfield | <b>Hazard Risk and Bushfire:</b> The EA does not address the possibility of lightning strikes reducing the reliability of the line. This area of the country has many incidents of lightning.   | 4.12.3.2          |
| 21720              | Name Withheld of Tenterfield | <b>Hazard Risk and Bushfire:</b> The Easement could provide a refuge in the event of a bushfire. This could increase the risk of electrocution.   | 4.12.3.4          |
| 21720              | Name Withheld of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The CSIRO 2009 IGrid Report into energy use on the Far North Coast found that even if TranGrid's Projections for growth in peak demand had been correct, the current Projected capacity shortfall could be comfortably met by distributed energy options e.g. local generation, energy efficiency and demand management.  | 4.2.3.4           |

## Appendix A - Summary of Submissions

| Public Submissions |                                |   |                    |
|--------------------|--------------------------------|---|--------------------|
| Submission Number  | Author                         | Comment   | Section Addressed  |
| 21720              | Name Withheld of Tenterfield   | <b>Project Needs, Justification and Alternatives:</b> The submission states that TransGrid have failed to comply with the mandatory requirements of the National Electricity Rules, Section 5.6.6 by not exploring non network alternatives prior to its initial Project and that they still have not done so.  | 4.2.3.4            |
| 21720              | Name Withheld of Tenterfield   | <b>Socio economics:</b> The land in the area will lose resale value.  | 4.14.3.1           |
| 21720              | Name Withheld of Tenterfield   | <b>Socio economics:</b> The Project is contrary to the Government's policy carbon reduction   | 4.14.3.9           |
| 21720              | Name Withheld of Tenterfield   | <b>Socio economics:</b> The transmission line could have an impact of the ability of Tenterfield to grow organically to the north.  | 4.14.3.3           |
| 21720              | Name Withheld of Tenterfield   | <b>Visual Assessment:</b> The visual impact of the Project would have a detrimental impact on the tourist industry  | 4.8.3.4            |
| 21720              | Name Withheld of Tenterfield   | <b>Biodiversity:</b> The EA does not adequately address the risk of contamination and spread of weeds along the transmission line during construction of the Project  | 4.6.3.19           |
| 21799              | Jane l'Ons of Tenterfield      | <b>Air Quality and Greenhouse Gas:</b> The CO2 emissions from coal fired power stations create a significant environmental impact and represent an out-dated power generation technology  | 4.11.3.2           |
| 21799              | Jane l'Ons of Tenterfield      | <b>Project Needs, Justification and Alternatives:</b> The justification for the Project is based on faulty information.   | 4.2.3.5            |
| 21847              | Paulene Brookes of Tenterfield | <b>EMF:</b> Presence of the power line with 150 m of the property raises health-impact concerns over, and more specifically issues to do with their effects on pacemakers.  | 4.13.3.1           |
| 21847              | Paulene Brookes of Tenterfield | <b>Non-indigenous Heritage:</b> There are items of non-indigenous heritage in the vicinity of the Project – the context of these items will be impacted by the Project.   | 4.7.3.1            |
| 21847              | Paulene Brookes of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> “TransGrid 's predicted energy demands are based upon population growth, rather than actual energy usage, which has according to TransGrid 's own documentation actually declined or remained flat over the past three years despite increasing population growth on the North Coast. TransGrid 's failure to take into account the growing trend of alternate energy sources is a direct breach of the National Electricity Rules. While the AER 2010 Report notes that TransGrid fixed this breach in May 2010, some two years after the April 2008 Application Notice, this does not alter the fact that TransGrid breached the Act and section 5.6.6, in not having completed this mandatory requirement of the Act prior to the 2008 application notice. “ | 4.2.3.5<br>4.2.3.3 |

## Appendix A - Summary of Submissions

| Public Submissions |                                |  |                      |
|--------------------|--------------------------------|--|----------------------|
| Submission Number  | Author                         | Comment  | Section Addressed    |
| 21847              | Paulene Brookes of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The applicant did not take into any account the impact of non-network options prior to its initial proposal as mandated by section 5.6.6 of the National Electricity Rules | 4.2.3.4              |
| 21847              | Paulene Brookes of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The applicant does not take the region's uptake in energy saving technology and renewable energy into account.   | 4.2.3.4              |
| 21847              | Paulene Brookes of Tenterfield | <b>Socio Economic:</b> The line will have an impact on the value of land and therefore on the value of superannuation of the residents.  | 4.14.3.1<br>4.14.3.5 |
| 21847              | Paulene Brookes of Tenterfield | <b>Biodiversity:</b> <i>"I also wish to object to the TransGrid proposed Project on the basis of the Ecological Impacts on the ecology and landscape with our property being the home of lyrebirds and Koalas"</i>               | 4.6.3.2              |
| 21847              | Paulene Brookes of Tenterfield | <b>Biodiversity:</b> There will be impacts on the ecology of the area, specifically to lyrebirds and Koalas.   | 4.6.3.2              |
| 21892              | Justyn Comer of Potts Point    | <b>Air Quality and Greenhouse Gas:</b> The Project is supporting the use of coal-fired power stations instead of renewable fuels.  | 4.11.3.2             |
| 21892              | Justyn Comer of Potts Point    | <b>Socio-economics:</b> The high cost of the Project is going to increase the cost of electricity in the region.   | 4.14.3.4             |
| 21892              | Justyn Comer of Potts Point    | <b>Biodiversity:</b> <i>"this is going to destroy one of the most extraordinary places where time has stood still and allowed fascinating flora and fauna to live and flourish!!!"</i>   | 4.6.3.1              |
| 21892              | Justyn Comer of Potts Point    | <b>Biodiversity:</b> The Project is likely to have a detrimental impact on unique and threatened ecological communities.   | 4.6.3.1              |
| 21908              | Name Withheld of Beerwah       | <b>Air Quality and Greenhouse Gas:</b> Mentioned.  | Section 4.11         |
| 21908              | Name Withheld of Beerwah       | <b>Indigenous Heritage:</b> Mentioned.   | Section 4.7          |
| 21908              | Name Withheld of Beerwah       | <b>Noise and Vibration:</b> General point listed as a concern  | Section 4.10         |
| 21908              | Name Withheld of Beerwah       | <b>Non – indigenous Heritage:</b> Mentioned.   | Section 4.7          |

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| Public Submissions |                          |   |                     |
|--------------------|--------------------------|---|---------------------|
| Submission Number  | Author                   | Comment   | Section Addressed   |
| 21908              | Name Withheld of Beerwah | <b>Project Needs, Justification and Alternatives:</b> The need for the Project is not fully justified   | 4.2.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Project Needs, Justification and Alternatives:</b> The Project does not represent the most cost effective option to meet the Project Objectives.   | 4.2.3.6             |
| 21908              | Name Withheld of Beerwah | <b>Socio-economics:</b> Compensation being offered is not adequate  | 4.14.3.6            |
| 21908              | Name Withheld of Beerwah | <b>Socio-economics:</b> Heavy impacts on tourism are expected   | 4.14.3.2            |
| 21908              | Name Withheld of Beerwah | <b>Socio-economics:</b> Land values would be reduced as a result of the Project   | 4.14.3.1            |
| 21908              | Name Withheld of Beerwah | <b>Surface Water and Hydrology:</b> General objection on the grounds of surface water impacts   | 4.5.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Traffic and Transportation:</b> Mentioned.   | 4.9.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Visual Assessment:</b> The impact on the Project on the tourist industry would be marked.  | 4.8.3.4<br>4.14.3.2 |
| 21908              | Name Withheld of Beerwah | <b>Visual Assessment:</b> General impacts to visual amenity within a beautiful landscape  | 4.8.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Consultation:</b> General inadequacy   | 4.3.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Soils, Geology and Topography:</b> There would be impacts  | 4.4.3.1             |
| 21908              | Name Withheld of Beerwah | <b>Biodiversity:</b> The URS Biodiversity report is inadequate for approval authorities to effectively assess the impact of the development   | 4.6.3.14            |
| 21908              | Name Withheld of Beerwah | <b>Biodiversity:</b> The Project passes over and has the potential to further fragment two communities located on the Moorabinda property listed in the EPBC Act, and this fragmentation has been inadequately addressed. | 4.6.3.5             |

## Appendix A - Summary of Submissions

| Public Submissions |                               |  |                     |
|--------------------|-------------------------------|--|---------------------|
| Submission Number  | Author                        | Comment  | Section Addressed   |
| 21908              | Name Withheld of Beerwah      | <b>Biodiversity:</b> <i>"the URS Biodiversity report is inadequate for approval authorities to effectively assess the impact of the development" and "the easement passes over 2 EPBC's on Moorabinda which are listed as national significance, and which have not had the impact upon their fragmentation properly assessed"</i> | 4.6.3.5<br>4.6.3.14 |
| 21910              | Name Withheld of Corinda      | <b>Socio-economics:</b> There will be impacts  | 4.14                |
| 21910              | Name Withheld of Corinda      | <b>Visual Assessment:</b> "I believe the Project will adversely affect the visual amenity of the area"   | 4.8.3.1             |
| 21910              | Name Withheld of Corinda      | <b>Biodiversity:</b> There will be impacts, based on knowledge of the property known as "Moorabinda" and surrounding area.   | 4.6.3.1             |
| 21912              | Colin Kilburn                 | <b>Project Needs, Justification and Alternatives:</b> there has been insufficient research into alternative power generation methods.  | 4.2.3.4             |
| 21912              | Colin Kilburn                 | <b>Socio Economics:</b> Land values in the area will be reduced as a result of the Project.  | 4.14.3.1            |
| 21912              | Colin Kilburn                 | <b>Socio Economics:</b> There will be an impact on Tourism   | 4.14.3.2            |
| 21912              | Colin Kilburn                 | <b>Visual Assessment:</b> Impact on Tourism  | 4.8.3.4             |
| 21912              | Colin Kilburn                 | <b>Visual Assessment:</b> Visual impact will decrease value of land  | 4.8.3.5             |
| 21914              | Name Withheld of Potts Point, | <b>Air Quality and Greenhouse Gas:</b> The Project represents an increased reliance on coal generated electricity  | 4.11.3.2            |
| 21914              | Name Withheld of Potts Point, | <b>Visual Assessment:</b> The Project will Impact on the natural beauty of the area.   | 4.8.3.1             |
| 21914              | Name Withheld of Potts Point, | <b>Biodiversity:</b> The area will suffer irreparable ecological damage as a result of the Project   | 4.6.3.1             |
| 21916              | Name Withheld of Potts Point  | <b>Air Quality and Greenhouse Gas:</b> The Project represents an increased reliance on coal generated electricity  | 4.11.3.2            |
| 21916              | Name Withheld of Potts Point  | <b>Visual Assessment:</b> The Project will Impact on the natural beauty of the area.   | 4.8.3.1             |

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| Public Submissions |                                |  |                   |
|--------------------|--------------------------------|--|-------------------|
| Submission Number  | Author                         | Comment  | Section Addressed |
| 21916              | Name Withheld of Potts Point   | <b>Biodiversity:</b> The area will suffer irreparable ecological damage as a result of the Project   | 4.6.3.1           |
| 21918              | Craig Rose of Elanora          | <b>EMF:</b> The Submission raises concerns about the safety of the Transmission lines, especially when young children are concerned  | 4.13.3.1          |
| 21918              | Craig Rose of Elanora          | <b>Biodiversity:</b> There will be a negative impact on the native flora and fauna of the area.  | 4.6.3.1           |
| 21920              | Marilyn Moballe of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The submission makes reference to the UTS report commissioned by UDAG and TAG into the need for the Project. This states that the construction of the transmission line is both unnecessary and the least economic alternative for providing energy for the far north coast of NSW   | 4.2.3.6           |
| 21920              | Marilyn Moballe of Tenterfield | <b>Socio Economics:</b> No assessment has been conducted into the impact of the Project on the levels of tourism on the area.  | 4.14.3.2          |
| 21920              | Marilyn Moballe of Tenterfield | <b>Socio Economics:</b> The compensation that is being offered is inadequate   | 4.14.3.6          |
| 21920              | Marilyn Moballe of Tenterfield | <b>Socio Economics:</b> “The cost in the decline of tourism, especially ecotourism, across the entire Project area has not been considered in the EA, and financial compensation has not been factored into the financial costing of the Project.”   | 4.14.3.2          |
| 21920              | Marilyn Moballe of Tenterfield | <b>Visual Assessment:</b> “Near Tenterfield the proposed line would pass through, or in front, of the beautiful Boonoo Boonoo range, which for much of its length forms the border between NSW and Queensland. This range is a striking feature of the Tenterfield district and can be seen from many kilometres distant. It is absurd for TransGrid to maintain that any visual impact will be minimal.”  | 4.8.3.2           |
| 21920              | Marilyn Moballe of Tenterfield | <b>Visual Assessment:</b> “The beautiful rural and wilderness outlook for residents will be dramatically changed. Land values will inevitably decline; there will be no compensation for this decline. This devaluation of land has not been included in TransGrid 's estimation of the cost of the Project. In short the line affects the whole community's visual amenity, but there is no compensation” | 4.8.3.5           |

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| Public Submissions |                                |  |                   |
|--------------------|--------------------------------|--|-------------------|
| Submission Number  | Author                         | Comment  | Section Addressed |
| 21920              | Marilyn Moballe of Tenterfield | <p><b>Visual Assessment:</b> “TransGrid 's visual assessment grossly minimises the impact of the transmission line on the visual amenity of northern New South Wales.”</p> <p>“It is absurd for TransGrid to maintain that any visual impact will be minimal. What we have here is structures which will have an enormous visual impact. The beautiful rural and wilderness outlook for residents, and tourists, will be dramatically changed.”</p> <p>The submission invites planning authorities to drive from Wallangarra to Tenterfield along the New England Highway or west from the Bruxner Highway - New England Highway intersection. “...They would travel along the valley of Tenterfield Creek. The tree cover in this region is minimal; the towers and transmission wires would be visible from all locations over a long period of time. In particular the views to the Doctors Nose to the south and Sundown National Park to the north would be severely impacted by the line.”</p> | 4.8.3.2           |
| 21922              | Richard Harpham                | <b>Project Needs, Justification and Alternatives:</b> The Submission states that the Project does not represent the most cost effective option to meet the requirements of the Project   | 4.2.3.6           |
| 21922              | Richard Harpham                | <b>Project Needs, Justification and Alternatives:</b> The submission states that there is no justification for the Project   | 4.2.3.1           |
| 21922              | Richard Harpham                | <b>Socio Economics:</b> The impact of the Project is considerable and the compensation is inadequate. .  | 4.14.3.6          |
| 21922              | Richard Harpham                | <b>Visual Assessment:</b> The amenity of the area would be badly affected.   | 4.8.3.1           |
| 21922              | Richard Harpham                | <b>Biodiversity:</b> “The bio-diversity report is inadequate”; and two EPBC EECs are impacted  | 4.6.3.14          |
| 21924              | Susan Yeates                   | <b>Project Needs, Justification and Alternatives:</b> The submission states that the amount of network support is not justified.   | 4.2.3.1           |
| 21924              | Susan Yeates                   | <b>Socio Economics:</b> The Project would have an impact on the ability of existing land holders to further subdivide their property.  | 4.14.3.5          |
| 21924              | Susan Yeates                   | <b>Soils, Geology and Topography:</b> There would be impacts.  | 4.4.3.1           |
| 21924              | Susan Yeates                   | <b>Surface Water and Hydrology:</b> Comments that there would be soil and surface water impacts occurring in areas noted as nationally significant. The submission states that the impacts have not be properly assessed.  | 4.5.3.2           |
| 21924              | Susan Yeates                   | <b>Visual Assessment:</b> “Those who are attempting to run a tourism related business will find it particularly difficult, since the visual amenity issues will affect their businesses”   | 4.8.3.4           |
| 21924              | Susan Yeates                   | <b>Biodiversity:</b> The ecological impacts to two EPBC EECs on Moorabinda and their potential fragmentation have not been properly assessed   | 4.6.3.5           |

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| Public Submissions |  |  |                       |
|--------------------|--|--|-----------------------|
| Submission Number  | Author                                     | Comment  | Section Addressed     |
| 21926              | Donna Harpham of Roseville                 | <b>Other:</b> The submission objects on environmental grounds.   | No response required. |
| 21934              | Christine Harpham of Blue Mountain Heights | <b>Air Quality and Greenhouse Gas:</b> The Project encourages the use of Coal-Generated power.   | 4.11.3.2              |
| 21934              | Christine Harpham of Blue Mountain Heights | <b>Socio economics:</b> The Project is contrary to the Government's desire for Carbon Reduction  | 4.14.3.9              |
| 21934              | Christine Harpham of Blue Mountain Heights | <b>Biodiversity:</b> The submission believes that the assessment has not been rigorous.  | 4.6.3.14              |
| 21936              | <i>Name Withheld</i> of Grabben Gullen     | <b>Other:</b> Objection  | No response needed.   |
| 21940              | Lynn Takayama & Leigh Kelly                | <b>EMF:</b> Concerned about the associated health impacts of transmission lines due to requirement to regularly pass under the lines to access/egress their property.  | 4.13.3.1              |
| 21940              | Lynn Takayama & Leigh Kelly                | <b>Project Needs, Justification and Alternatives:</b> The estimation of the power requirements of the area have been miscalculated. Given the demographics of the area concerned, the demand for power will continue to diminish. An enormous transmission line as the one proposed will become a wasteful cost to the taxpayer. | 4.2.3.5<br>4.2.3.6    |
| 21940              | Lynn Takayama & Leigh Kelly                | <ul style="list-style-type: none"> <li><b>Project Needs, Justification and Alternatives:</b> The generation of power should be local and renewable.</li> </ul>   | 4.2.3.4               |
| 21940              | Lynn Takayama & Leigh Kelly                | <b>Socio Economics:</b> Land and property will be devalued and have an impact on superannuation.   | 4.14.3.1              |
| 21940              | Lynn Takayama & Leigh Kelly                | <b>Biodiversity:</b> The ecological assessment has a variety of deficiencies.  | 4.6.3.14              |
| 21942              | Julian Scantlebury                         | <b>Visual Assessment:</b> "I would very much like to see far more consideration given to the long term effect on rural tourism brought about by a Project which will so obviously be detrimental to the visual landscape and the natural environment. "  | 4.8.3.4               |
| 21942              | Julian Scantlebury                         | <b>Socio Economics:</b> The Project would have a detrimental impact on rural tourism in the area.  | 4.14.3.2              |
| 21942              | Julian Scantlebury                         | <b>Biodiversity:</b> The submission states that further ecological study may be necessary.   | 4.6.3.17              |

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| Public Submissions |                               |  |                     |
|--------------------|-------------------------------|--|---------------------|
| Submission Number  | Author                        | Comment  | Section Addressed   |
| 21944              | Name Withheld of Kobble Creek | <b>Visual Assessment:</b> The Project will have an impact on present and future enjoyment of the area.   | 4.8.3.1             |
| 21946              | Merlene Madge of Newstead,    | <b>Biodiversity:</b> The Project will have an impact on the local wildlife.  | 4.6.3.1             |
| 21951              | Name Withheld of Tenterfield  | <b>Hazard Risk and Bushfire:</b> Increased risk of bush fires due to high voltage power lines is a concern validated by the findings of the Royal Commission into the devastating fires in Victoria.   | 4.12.3.1            |
| 21951              | Name Withheld of Tenterfield  | <b>Project Needs, Justification and Alternatives:</b> TransGrid did not investigate alternatives to the line as required by the national electricity rules.  | 4.2.3.4             |
| 21951              | Name Withheld of Tenterfield  | <b>Project Needs, Justification and Alternatives:</b> TransGrid used highly inflated figures when predicting future energy use on the Far North Coast to justify the construction of this power line.  | 4.2.3.5             |
| 21951              | Name Withheld of Tenterfield  | <b>Visual Assessment:</b> The Project is spoiling iconic Australian Landscape.   | 4.8.3.1             |
| 21951              | Name Withheld of Tenterfield  | <b>Air Quality:</b> Promoting carbon based electricity   | 4.11.3.2            |
| 21951              | Name Withheld of Tenterfield  | <b>Visual Assessment:</b> Impact on Tourism  | 4.8.3.4<br>4.14.3.2 |
| 21951              | Name Withheld of Tenterfield  | <b>Visual Assessment:</b> Visual impact will decrease value of land  | 4.8.3.5             |
| 21951              | Name Withheld of Tenterfield  | <b>EMF:</b> Concerned about the well documented health concerns relating to transmission lines.  | 4.13.3.1            |
| 21951              | Name Withheld of Tenterfield  | <b>Biodiversity:</b> There will be permanent destruction of native endangered habitat.   | 4.6.3.1             |
| 21953              | Susan Bailey of Tenterfield   | <b>Visual Assessment:</b> The Project will impact unfavourably on the visual amenity of the area.  | 4.8.3.1             |
| 21953              | Susan Bailey of Tenterfield   | <b>Project Needs, Justification and Alternatives:</b> TransGrid has predicted energy demands on Projected population growth, rather than actual energy usage, which has according to TransGrid 's own documentation declined or remained flat over the last 3 years despite increasing population growth on the North Coast. | 4.2.3.5             |

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| Public Submissions |                                 |   |                      |
|--------------------|---------------------------------|---|----------------------|
| Submission Number  | Author                          | Comment   | Section Addressed    |
| 21953              | Susan Bailey of Tenterfield     | <b>Project Needs, Justification and Alternatives:</b> The submission states that the Project fails to take the regions uptake of energy saving and renewable energy technology into account.  | 4.2.3.4              |
| 21953              | Susan Bailey of Tenterfield     | <b>Project Needs, Justification and Alternatives:</b> TransGrid did not taken any account of the impact of non-network options prior to its initial proposal as mandated by section 5.6.6. the National Electricity Rules.  | 4.2.3.4<br>4.2.3.3   |
| 21953              | Susan Bailey of Tenterfield     | <b>Heritage:</b> “The proposed route for the power line also impacts on prime tourist sites in the Tenterfield district, namely Thunderbolts hideout, the World War Two Tank Traps and the World War Two London Bridge army camp site”  | 4.7.3.1              |
| 21953              | Susan Bailey of Tenterfield     | <b>Socio Economics:</b> The Project would have a detrimental impact on tourism  | 4.14.3.2             |
| 21953              | Susan Bailey of Tenterfield     | <b>Socio Economics:</b> The submission states that the Project will have a detrimental impact on land values in the area and poses a threat to traditional beef cattle and organics farming.  | 4.14.3.1<br>4.14.3.7 |
| 21953              | Susan Bailey of Tenterfield,    | <b>Visual Assessment:</b> “Tourism is a very important and growing source of economic development in the Tenterfield district and to destroy these popular tourist destinations, either by the visual pollution of power lines or by transgressing in the vicinity of these areas is economically, historically and environmentally irresponsible...”                         | 4.8.3.4              |
| 21953              | Susan Bailey of Tenterfield     | <b>Biodiversity:</b> The proposed route for the transmission lines through the Tenterfield region will impact dramatically on a number of indigenous fauna and flora listed as environmentally significant. In particular the proposed route will impact on the Conservation of EPBC Act listed communities White Box, Blakely's Red Gums, Orange Gums, Lyrebirds and Koalas. | 4.6.3.3              |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Socio Economics:</b> The compensation that is being offered is inadequate  | 4.14.3.6             |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Socio Economics:</b> Decreased land value  | 4.14.3.1             |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Socio Economics:</b> The construction process will cause a disruption to production of beef.   | 4.14.3.7             |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Socio Economics:</b> The Project makes further subdivision of land impossible.   | 4.14.3.5             |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Traffic and Transportation:</b> Additionally that the EA has incorrectly identified the Highway as an RTA road.  | 4.9.3.4              |
| 21955              | <i>Name Withheld</i> of Bonshaw | <b>Traffic and Transportation:</b> The Bruxner Highway is not a suitable road for servicing the construction.   | 4.9.3.3              |

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| Submission Number  | Author                       | Comment  | Section Addressed |
| 21955              | Name Withheld of Bonshaw     | <b>Visual Assessment:</b> The visual amenity of the area will be impacted by the Project.  | 4.8.3.1           |
| 21955              | Name Withheld of Bonshaw     | <b>EMF:</b> Concerned about the effects of EMFs and associated 'lack of study' in to their impacts in relation to the transmission line.   | 4.13.3.1          |
| 21955              | Name Withheld of Bonshaw,    | <b>Consultation:</b> "Unfortunately, our dealings with TransGrid have been unsatisfactory, without genuine appreciation of our concerns."  | 4.3.3.3           |
| 21957              | Julia Harpham of Tenterfield | <b>Visual Assessment:</b> This submission raises a concern about the subjective nature of visual impact assessment. The submission questions whether the URS report has used acceptable methods of measurement of visual impact, citing an example of a photomontage included in the VIA.<br>"A photo published in the URS report of a house further down the valley belonging to the Hamel family as an example of how low the visual amenity effect will be, has shocked and upset that family by how grossly ugly it looks. Mrs Boggs who is a daughter of the Hamels and who lives on Moorabinda is extremely stressed by the photo. We object on the grounds that there can be no measurement of how much the line is noticeable, because that is a subjective measurement and not an objective one. The URS report has not used acceptable methods of measurement of visual impact." | 4.8.3.2           |
| 21957              | Julia Harpham of Tenterfield | <b>Consultation:</b> "Access roads consultation has been extremely poor or non-existent. ... Indeed in many cases (our own included) the first thing we knew about the access tracks was when they were published last month."   | 4.3.3.2           |
| 21957              | Julia Harpham of Tenterfield | <b>Consultation:</b> "Much of their consultation they demand to be secret, which is not a legal requirement. TransGrid is still following the practice of one-by-one basis negotiations, and making landowners sign a privacy agreement with them to not disclose the amounts being offered to each landholder."<br>"At present they are trying to intimidate landowners into signing agreements even though this Project has not been passed by the Planning Department"  | 4.3.3.3           |
| 21957              | Julia Harpham of Tenterfield | <b>Consultation:</b> No direct consultation has been engaged by TransGrid outside the immediately impacted area. "The man who works for us will be very heavily impacted, and so far he and his wife have received no communication from TransGrid."<br>"We object on the grounds that all persons impacted should have according to regulations been contacted."  | 4.3.3.4           |

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| Submission Number  | Author                       | Comment  | Section Addressed    |
| 21957              | Julia Harpham of Tenterfield | <p><b>Consultation:</b> The submission from Julia Harpham (21957) included a number of concerns about the adequacy of the consultation and compensation process employed by TransGrid .</p> <p>“We object on the grounds that the consultation process has been inadequate, and that TransGrid has not followed the recommendations of the Senate. (see Attached Eastlink report comparison)”</p> <p>“They say that few people registered complaints to them – mostly because early in the process it became clear that all complaints simply received the same rote replies full of the same twaddle and inaccuracy that we have complained of elsewhere.”</p> <p>“The initial posting of their intention to build was done without affected landowners having the opportunity to object. We have only had this opportunity to object since the Planning Department required an EIS to be done.”</p>  | 4.3.3.1              |
| 21957              | Julia Harpham of Tenterfield | <p><b>EMF:</b></p> <p>Points raised in the submission include:</p> <ul style="list-style-type: none"> <li>the health effects on native wildlife from EMFs living across the proposed easement, many of whom are rare and endangered have never been studied (and are not addressed in the EA);</li> <li>associated EMF-induced effects to livestock fertility and crops grown in proximity to transmission lines is not properly researched;</li> <li>the ‘fairly conclusive’ studies linking health problems with high-voltage power lines (childhood cancers, Alzheimers Disease) with the observation that as more statistics are gathered uncertainty will decrease;</li> <li>the potential negligence of granting approval in the absence of certainty relating to human health impacts; and</li> <li>potential EMF induced health effects have not been accounted for and that to ensure ‘good health’ is the subject of prudent avoidance.</li> </ul> <p>Reference made to a senate inquiry relating to the proposed Eastlink HV Powerlink (TransGrid ): Inferred concern for the proposed application relating to:</p> <ul style="list-style-type: none"> <li>inconclusive effects on livestock resulting for the EMF impacts associated HV power lines necessitating more study; and</li> <li>the favour of compensatory payment to owners who suffer economic loss due to the construction of the power line, regardless of how it is brought about (which infers acceptance of health effects from EMF being a potential cause).</li> </ul> | 4.13.3.1<br>4.13.3.2 |

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|                    |                              | The inquiry summary also notes that the commonly raised objections related to health were: <ul style="list-style-type: none"> <li>the perceived dangers to health from exposure to ENTE, particularly for children living in close proximity to the power line; and</li> <li>mental and physical health of landholders along the proposed route and on their marital relationship</li> </ul>  |                               |
| 21957              | Julia Harpham of Tenterfield | <b>Other</b> The health impacts extend further as people who live under the transmission line have been suffering increased anxiety as a result of the Project  | 4.15.3.1                      |
| 21957              | Julia Harpham of Tenterfield | <b>Other:</b> The EA is not adequate for the assessment of the Project  | 4.15.3.3                      |
| 21957              | Julia Harpham of Tenterfield | <b>Hazard, risk and Bushfire:</b> According to the TransGrid officials, to prevent build-up of static charge, fences and gates in the vicinity of the transmissions line would have to be earthed. Does this mean when it's wet we can't fence? Does it mean we will be electrocuted if the earths are inefficient or removed by flood or bushfire? We object on the grounds that we have not had a clear explanation of the impacts of static electricity, or even if this will cause bushfires. | 4.12.3.4<br>4.12.3.1          |
| 21957              | Julia Harpham of Tenterfield | <b>Hazard, risk and Bushfire:</b> The TransGrid Project plays down the real threat of bushfires, places the likelihood as quite low, and does not take in to account the lack of a localized Crisis Management Plan for us as residents and landholders to access in the event of a crisis.   | 4.12.3.1                      |
| 21957              | Julia Harpham of Tenterfield | <b>Indigenous Heritage:</b> The line was not adequately surveyed for aboriginal heritage, and Kamilaroi people were not consulted.  | 4.7.3.4<br>4.7.3.3<br>4.7.3.2 |
| 21957              | Julia Harpham of Tenterfield | <b>Indigenous Heritage:</b> There is an indigenous Birthing place in the vicinity of the alignment which would be impacted by the Project. Despite this information being "secret" URS was alerted to it. However no suitable arrangements were made to assess the significance of this location.   | 4.7.3.2                       |
| 21957              | Julia Harpham of Tenterfield | <b>Noise and Vibration:</b> There will be severe impact from the construction of the Project on both residents and local endangered species.  | 4.10.3.1<br>4.10.3.2          |
| 21957              | Julia Harpham of Tenterfield | <b>Noise and Vibration:</b> traffic generated noise and vibrations  | 4.10.3.1                      |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Project does not comply with the NER as the Request for Proposals released by TransGrid did not seek proposals for alternatives to the construction of the line. Therefore the AER decision not to challenge the Proposal is based on incorrect information.  | 4.2.3.2<br>4.2.3.3            |

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| Submission Number  | Author                       | Comment   | Section Addressed   |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Project is contrary to the current thinking regarding energy provision – specifically the Carbon Tax and renewable energy provision.  | 4.2.3.4<br>4.14.3.9 |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Project is not compliant with the AER regulations   | 4.2.3.3             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Project is not needed.  | 4.2.3.1             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's proposal says it will have a 50 year life. In 20 years time, experts agree that the sources and infrastructure supplying households could look very different from today's models.   | 4.2.3.1             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The coal seam gas find at Casino has not been mentioned as an alternative. It is unlikely to be possible to export this gas; therefore it could be used locally.  | 4.2.3.4             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The University of Technology Sydney (UTS) (commissioned by UDAG) report clearly supports that electricity does not have to be supplied over long lines carrying coal fired power, which lose up to 15% of their power in being transported.   | 4.2.3.5             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> TransGrid are a carrier and have a vested interest in maintaining a need for energy transmission by not investing in smart grids and local generation.  | 4.2.3.4             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> TransGrid has not followed any of the recommendations of the Senate Committee, and must be called to account for continuing to do business in a way which our Senate was clearly critical of.   | 4.2.3.3             |
| 21957              | Julia Harpham of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> TransGrid has the power to compulsorily purchase land subject to two conditions:<br><ol style="list-style-type: none"> <li><b>ultra vires</b> There is, of course, no question about TransGrid generally having legal power under the Act to resume an easement through freehold land. That said, if they have not complied with any procedural requirements that are a pre-condition to being able to use the resumptive power, or they don't comply with the processes under the Act itself, then this may give grounds for saying they are acting "outside of power". And</li> <li><b>mala fides</b> Requires TransGrid to give objective and bona fide consideration to what is "necessary" to achieve the relevant public purpose. A court has no power to review TransGrid 's decision on the merits in order to determine which is the "best" or "correct" decision, and can only interfere if the particular choice made by TransGrid was not reasonably and rationally open to TransGrid in all the circumstances</li> </ol> Neither of these have been met. | 4.2.3.3             |

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| Submission Number  | Author                       | Comment   | Section Addressed    |
| 21957              | Julia Harpham of Tenterfield | <b>Socio Economics:</b> The land values in the area will be depleted and the compensation being offered by TransGrid does not match the impact caused.  | 4.14.3.6             |
| 21957              | Julia Harpham of Tenterfield | <b>Socio Economics:</b> The Project will have no positive impact on Inverell or Tenterfield Shires.   | 4.14.3.8             |
| 21957              | Julia Harpham of Tenterfield | <b>Socio Economics:</b> Economic benefits as stated in the EA are unlikely to have an impact on the local community as they do not supply any of the products that are likely to be used during construction.   | 4.14.3.8             |
| 21957              | Julia Harpham of Tenterfield | <b>Socio Economics:</b> The future use of the land will be impacted by the development.   | 4.14.3.5             |
| 21957              | Julia Harpham of Tenterfield | <b>Socio Economics:</b> there is likely to be an impact on eco-tourism in the area.   | 4.14.3.2             |
| 21957              | Julia Harpham of Tenterfield | <b>Socio-economic:</b> Land valuations done by TransGrid do not reflect future land valuations should properties be subdivided, additionally, sales have fallen through as a result of the Project.   | 4.14.3.5<br>4.14.3.1 |
| 21957              | Julia Harpham of Tenterfield | <b>Soils Geology and Topography:</b> there is fear that any disturbance to the soil, however minimal, will require ongoing work for years to remove the damage. Any rehabilitation work will be slip-shod and not on-going. The residents will be left with the expense of rehabilitation of land underneath the power lines.   | 4.4.3.2              |
| 21957              | Julia Harpham of Tenterfield | <b>Soils, Geology and Topography:</b> Impacts on landholders of future erosion issues as a result of the Project  | 4.4.3.2              |
| 21957              | Julia Harpham of Tenterfield | <b>Surface Water and Hydrology:</b> Stated objection to the Project based on inadequacy of flood risk assessment. In the Project it is stated that nowhere crossing the proposed line is there a likelihood of flood – untrue, Beardy River, Reedy Creek and Mole River would all have flooded across the proposed sites of pylons. The area where the proposed easement crosses Woolshed Creek and Reedy Creek on Moorabinda has flooded 3 times in the past 2 years, and washed away all the fences within proximity of both creeks<br>the development should not be carried out until a rural floodplain management plan is developed. | 4.5.3.3              |
| 21957              | Julia Harpham of Tenterfield | <b>Traffic and Transportation:</b> Increased traffic will have an impact on the nearby houses.  | 4.9.3.2              |
| 21957              | Julia Harpham of Tenterfield | <b>Traffic and Transportation:</b> School busses that operate on the Bruxner Highway will be adversely effected   | 4.9.3.5              |

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| Submission Number  | Author   | Comment  | Section Addressed |
| 21957              | Julia Harpham of Tenterfield                       | <b>Traffic and Transportation:</b> The proposal states that within the Tenterfield LGA, the Bruxner Hwy is a classified State road, and the RTA has the responsibility to fund, prioritise and carry out works. This is incorrect. This is a Shire Road not a State road.  | 4.9.3.4           |
| 21957              | Julia Harpham of Tenterfield                       | <b>Traffic and Transportation:</b> The roads in the area are already dangerous and would become more dangerous should the increase in traffic manifest itself.   | 4.9.3.2           |
| 21957              | Julia Harpham of Tenterfield                       | <b>Traffic and Transportation:</b> Wear to minor roads will not be repaired by TransGrid under the current EA  | 4.9.3.6           |
| 21957              | Julia Harpham of Tenterfield                       | <b>Traffic and Transportation:</b> The EA does not adequately assess the impact of unauthorised access to properties along the alignment through the new access tracks.  | 4.15.3.5          |
| 21957              | Julia Harpham of Tenterfield                       | <b>Visual Assessment:</b> The Project will be visible from the property  | 4.8.3.1           |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> If TransGrid is basing its Project on the benefits of interconnection, then they are basing their Project on coal fired power. This policy is no longer one which would benefit Australians.   | 4.2.3.4           |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> "Also, as the cost of electricity climbs, the use of electricity will decline because consumers are more careful with their usage, While TransGrid forecast an increase in peak demand of 46% between 2008 and 2017, demand has actually decreased for the past 3 years. "   | 4.2.3.5           |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> "The AER's letter of 22 December 2010 states that the AER's decision not to require TransGrid to comply with clause 5.6.6 is based on the belief that "a fundamentally different outcome was unlikely" and that this conclusion was reached because the RFP "contained sufficient information to enable prospective providers of non-network (and network) solutions to formulate alternative options."<br>Since the RFP did NOT seek proposals for alternatives to the construction of the 330kV line, how can the AER possibly maintain the RFP enabled prospective providers of non-network (and network) solutions to formulate and submit alternatives to the construction of the 330 kV line? This is simply and plainly not true! i.e. the AER have based their conclusion (about the unlikelihood of a fundamentally different outcome) on an understanding about the RFP that was totally incorrect." | 4.2.3.4           |

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| Submission Number  | Author   | Comment  | Section Addressed              |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> “The building of such infrastructure requires at least a 25 -to 50 year life for it to be viable, and there is no forward planning which could guarantee that life span for this infrastructure. In 20 years time, experts agree that the sources and infrastructure supplying households could look very different from today's models. We are concerned that even within 5 years, this proposal could be a massive waste of money, It is worthwhile to remember that TransGrid exists to carry power, and would probably not exist if smart grids and local supply solutions were developed. They clearly have a vested interest as a Corporation to continue to operate in the way they were originally set up. “ | 4.2.3.4<br>4.2.3.6             |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> “TransGrid have started to talk about "peak demand" as the reason for building, It does seem incongruous that a government would spend such a huge sum on a possibility of need for 3 days of the year this possibility being exactly that. “  | 4.2.3.5                        |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> The AER published a deeply critical report about the proposal. At present (through the ACCC) UDAG are pursuing the reasons why they did not demand the proposal to be withdrawn completely.  | 4.2.3.3                        |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> TransGrid have not complied with regulations, and their economic modelling was incorrect. There are far more economically sustainable avenues to follow than building a power line. The UTS report clearly supports that electricity does not have to be supplied over long lines carrying coal fired power, which lose up to 15% of their power in being transported.   | 4.2.3.3<br>4.2.3.4             |
| 21957              | Julia Harpham of Tenterfield (EastLink Comparison) | <b>Project Needs, Justification and Alternatives:</b> TransGrid have not recognised the inaccuracy of their demand forecasts for the last 3 years in forecasting future demand.  | 4.2.3.5                        |
| 21957              | Julia Harpham of Tenterfield                       | <b>Project Needs, Justification and Alternatives:</b> it is suggested that in a region with proven strong uptake of renewable energy sources, and at a time when both government policy (Carbon Tax) and local trends suggest a reduction in electricity usage, the stated need for the Project is inaccurate.   | 4.2.3.1<br>4.2.3.4<br>4.14.3.9 |
| 21957              | Julia Harpham of Tenterfield                       | <b>Project Needs, Justification and Alternatives:</b> TransGrid did not comply with the AER Guidelines in selecting the option for the Project.  | 4.2.3.3                        |
| 21957              | Julia Harpham of Tenterfield                       | <b>Project Needs, Justification and Alternatives:</b> Alternative energy sources, such as a Coal Seam Gas find at Casio were not adequately explored.  | 4.2.3.4                        |
| 21957              | Julia Harpham of Tenterfield                       | <b>Traffic and Transportation:</b> The Bruxner Highway is unsafe due to damage caused by recent flooding and general neglect. A massive increase in large vehicles carrying heavy loads, as well as workers transport will make this worse.  | 4.9.3.3                        |

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| Submission Number  | Author                       | Comment   | Section Addressed  |
| 21957              | Julia Harpham of Tenterfield | <b>Traffic and Transportation:</b> Vehicles on the unsealed roads (specifically Reedy Creek Road) will create noise, vibration and dust and cause damage to the road surface which TranGrid are not proposing to repair.  | 4.9.3.3<br>4.9.3.6 |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The submission comments that there are unique subspecies of Eucalyptus species within their property and along the proposed easement: “we have our own species which has developed Eucalyptus caleyi subsp. Ovendenii (Ovenden’s Ironbark) on Moorabinda with a few trees on adjoining properties, but also it was very likely that there were other species yet to be identified due to the interesting geographical changes in land, and the protective land forms. The Ovenden’s Ironbarks were listed as vulnerable and we understand may be raised to endangered. Some were identified on the proposed easement.” | 4.6.3.4            |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> There are EBPC listed species that will be impacted by the Project   | 4.6.3.3            |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The Project is likely to have a detrimental impact on unique and threatened Ecological communities.  | 4.6.3.1            |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> “The line passes over the Border Ranges which has been designated as a wildlife corridor and a World Heritage listed area, in order to protect species along it. The line would greatly impact upon this. We object on the grounds that as a World Heritage Area it should not be impacted by this proposal.”  | 4.6.3.6            |

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| Submission Number  | Author                       | Comment  | Section Addressed |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The following are found in the area (and are not covered adequately in the assessment): <ul style="list-style-type: none"> <li>• Brown Tree Creepers,</li> <li>• Grey Crowned Babblers,</li> <li>• Squatter Pigeons,</li> <li>• Diamond Firetails,</li> <li>• Red Goshawk,</li> <li>• Spotted Harrier,</li> <li>• Little Eagle,</li> <li>• Square Tailed Kite,</li> <li>• Black Tailed Cockatoos,</li> <li>• Spotted Tailed Quoll,</li> <li>• Bush Stone Curlews,</li> <li>• Koalas,</li> <li>• various Frogs,</li> <li>• varieties of bats and flying foxes,</li> <li>• various different native mice,</li> <li>• 3 different types of owls (all protected),</li> </ul> varieties of small parrots, gliders, wallabies small and large, kangaroos, and snakes. | 4.6.3.8           |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> Since the assessment was completed, further species and communities have been added to the TSC Act.   | 4.6.3.12          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The Biodiversity assessment was inadequate  | 4.6.3.14          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The Biodiversity report has omitted Dry Rainforest from the list of impacted Threatened Ecological Communities.   | 4.6.3.15          |

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| Submission Number  | Author                       | Comment   | Section Addressed |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The EA fails to identify one of the three EPBC identified communities within the property. "ALL of the area affected in our property is covered by EPBC, in fact 3 different types, although TransGrid only identifies 2. <i>White Box Yellow Box Blakely's Red Gum Grassy Woodland</i> and <i>Derived Native Grasslands</i> . The third, <i>Dry Rainforest</i> also occurs on the easement in our property, (within and adjacent to the creek beds) but was not identified."  | 4.6.3.15          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The Ecological assessment was not conducted in a thorough and unbiased manner.   | 4.6.3.14          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The poor survey results are of concern, as is the failure of the report to acknowledge the paucity of records. This along with the inconsistencies in the survey effort described and survey maps throw severe doubt on the effectiveness of the survey.   | 4.6.3.16          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The survey methodology was inadequate for a Project of this scale.   | 4.6.3.16          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The URS biodiversity report relies on old surveys of flora from similar areas, rather than performing their own vegetation mapping.  | 4.6.3.16          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The following species of grass have been identified in the assessment that suggest that the condition of Box Gum Woodland is better than stated in the assessment: <ul style="list-style-type: none"> <li>• <i>Themeda australis</i> (Kangaroo Grass),</li> <li>• <i>Poa spp</i> (Tussock Poa),</li> <li>• <i>Cymbopogon refractus</i> (Barbed Wiregrass),</li> <li>• <i>Bothriochloa biloba</i> (Lobed Redgrass) and</li> <li>• <i>Microlaena stipoides</i> (Weeping Rice Grass).</li> </ul> Additionally these descriptions indicate the presence of a number of forbs including; <ul style="list-style-type: none"> <li>• <i>Wurmbea biglandulosa</i> (Early Nancy),</li> <li>• <i>Bulbine bulbosa</i> (Native Leek),</li> <li>• <i>Glycine clandestina</i> (Twining Glycine) and</li> <li>• <i>Ranunculus lappaceus</i> (Common Buttercup).</li> </ul> | 4.6.3.17          |
| 21957              | Julia Harpham of Tenterfield | <b>Biodiversity:</b> The people doing the surveys for this Project were too inexperienced to identify what was here, let alone what might be here and has never been identified.  | 4.6.3.18          |

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|--------------------|---|--|---------------------|
| Submission Number  | Author                                    | Comment  | Section Addressed   |
| 22824              | Julia Harpham of Tenterfield (attachment) | <b>Biodiversity:</b> There are several incorrect statements within the ecological assessment, this includes the stated need for ecologists to be vaccinated with Lyssavirus inoculation.   | 4.6.3.13            |
| 21957              | Julia Harpham of Tenterfield              | <b>Biodiversity:</b> Weeds and future erosion on our properties has been identified as a future problem by them, but the Project does not adequately address how much future work will be done over the easements life, and it is likely that landholders will have ongoing issues with faults which occur and TransGrid 's obligations being fulfilled."  | 4.6.3.19<br>4.4.3.2 |
| 21957              | Julia Harpham of Tenterfield              | <b>Biodiversity:</b> TransGrid would develop a strategy to offset the impact of the Project – as yet the government policy that facilitates the creation of an offset strategy is unwritten. The trading of biodiversity credits is an unacceptable alternative to destroying "irreplaceable" habitat.   | 4.6.3.21            |
| 21957              | Julia Harpham of Tenterfield              | <b>Biodiversity:</b> There are several risks involved in implementing a biodiversity offset strategy, notably that the displaced fauna cannot simply move to new areas because of the existing fauna in that area. Also that the time lag (up to 140 years) between habitat loss and habitat recreation will result in local species extinctions.  | 4.6.3.21            |
| 21959              | Angelo Saccon of Tenterfield              | <b>Socio Economics:</b> The Project will restrict future development   | 4.14.3.5            |
| 21959              | Angelo Saccon of Tenterfield              | <b>Traffic and Transportation:</b> Access roads are poorly and incorrectly designed due to practicality and topography   | 4.15.3.4            |
| 21961              | William Eastgate of Tenterfield           | <b>Project Needs, Justification and Alternatives:</b> Corporations, including Government owned Corporation, that have a social conscience conduct their business sustainability. For a company to conduct itself sustainably it must balance the economic, environment and social impacts of a Project in accordance with its sustainability charter/policy. TransGrid does not have a sustainability policy or charter that is available to the public. Consequently it cannot and has not articulated the economic, environmental and social attributes of the Project with the objective of clearly defining, justifying and reporting to the public the trade-offs made when evaluating the Project. | 4.2.3.1             |
| 21961              | William Eastgate of Tenterfield           | <b>Project Needs, Justification and Alternatives:</b> No consideration has been given to alternatives to the Project   | 4.2.3.4             |
| 21961              | William Eastgate of Tenterfield           | <b>Project Needs, Justification and Alternatives:</b> The planning process undertaken by TransGrid for the proposed line from Dumaresq to Lismore is for a Project that has been initiated in isolation and with no visible strategic planning support.  | 4.2.3.1<br>4.2.3.5  |
| 21961              | William Eastgate of Tenterfield           | <b>Project Needs, Justification and Alternatives:</b> the Project does not comply with the requirements of the AER   | 4.2.3.3             |

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| Public Submissions |  |   |                      |
|--------------------|--|---|----------------------|
| Submission Number  | Author                                     | Comment   | Section Addressed    |
| 21961              | William Eastgate of Tenterfield            | <b>Project Needs, Justification and Alternatives:</b> TransGrid has a conflict of interest in maintaining a reliance on transmission lines and that in independent strategic assessment of the Power supplies of NSW should be conducted.   | 4.2.3.4              |
| 21961              | William Eastgate of Tenterfield            | <b>Socio Economics:</b> any negative impact on value of a property in the immediate vicinity of a transmission line or a property crossed by such a line was bluntly and categorically denied by the senior planners when meeting with TAG members in Tenterfield. This denial, in the face of clear evidence that property values do decrease casts serious doubt on the integrity of all aspects of the analysis and reporting related to this Project. | 4.14.3.1             |
| 21963              | <i>Name Withheld</i> of east Fremantle, WA | <b>Other:</b> I object to it.   | No Response Required |
| 21967              | <i>Name Withheld</i> of TENTERFIELD        | <b>Project Needs, Justification and Alternatives:</b> The Submission believes there is a 30% decline in energy needs to this area as to what was predicted from the original proposal.  | 4.2.3.5              |
| 21967              | <i>Name Withheld</i> of TENTERFIELD        | <b>Socio Economics:</b> House purchasers are dubious of the proposed corridors and didn't want to buy in the path of the power lines.   | 4.14.3.3             |
| 21970              | Neroli Endacott of Elanora                 | <b>Hazard Risk and Bushfire:</b> I would not be happy to visit nor have my grandchildren subjected to camping, playing or visiting the area with the loud hum of the huge overhead wires above and the danger below.  | 4.13.3.1             |
| 21970              | Neroli Endacott of Elanora                 | <b>Biodiversity:</b> This activity could potentially cause the disappearance of much local wildlife and many species of plants and animals may never recover from the disturbance.  | 4.6.3.1              |
| 21972              | David Harpham of Blue Mountain Heights     | <b>Project Needs, Justification and Alternatives:</b> My concern is based on an apparent mismatch between future power demands as suggested by TransGrid , and those of other reputable organisations....see the 2011 report of Rutovitz, Harris and Dunsta (University of Technology, Sydney).   | 4.2.3.5              |
| 21972              | David Harpham of Blue Mountain Heights     | <b>Biodiversity:</b> The submission refers to the Envirofactor report and comments on the highlighted deficiencies in environmental assessments conducted by TransGrid, and the efficacy of offset strategies.  | 4.6.3.14             |
| 21976              | Daniel l'Ons of Tenterfield                | <b>Hazard, risk and Bushfire:</b> The proximity of the proposed power line to the north (<2kms) and west (<3kms) of Sunnyside aerodrome presents a significant hazard both to aircraft in the circuit and aircraft taking off to the west, in particular during periods of low cloud.   | 4.12.3.3             |
| 21976              | Daniel l'Ons of Tenterfield                | <b>Socio Economics:</b> Future development of the aerodrome by Tenterfield Shire Council will be restricted   | 4.12.3.3             |

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| Public Submissions  |                              |   |                   |
|---------------------|------------------------------|---|-------------------|
| Submission Number   | Author                       | Comment   | Section Addressed |
| 21978               | Martin l'Ons of Tenterfield  | <b>Project Needs, Justification and Alternatives:</b> The proposed powerline will convey electricity that is produced predominantly from coal fired power stations when there is more than sufficient coal seam gas available at Casino to produce the required electricity for much lower CO2 emissions.   | 4.2.3.4           |
| 21986               | Edward Hickson               | <b>Indigenous Heritage:</b> no Aboriginal people have been consulted by TransGrid , despite the area containing significant heritage importance to the Kamilaroi people.  | 4.7.3.3           |
| 21986               | Edward Hickson               | <b>Project Needs, Justification and Alternatives:</b> There is not adequate demand for power on the Far North Coast of NSW to justify such a large scale Project.   | 4.2.3.5           |
| 21986               | Edward Hickson               | <b>Project Needs, Justification and Alternatives:</b> TransGrid has forecast an increase in peak demand of 46% between 2008 and 2017. However over the past three years, demand has actually decreased. The submission believes TransGrid has exaggerated the need. It has been suggested that a "do nothing approach" would be the best option. (See expert report from Sustainable Futures submitted by UDAG) | 4.2.3.5           |
| 21986               | Edward Hickson               | <b>Socio Economics:</b> Like many landholders and residents in the area, the submission has concerns about the proposed transmission line and its impact on the environment, the residents and the resulting loss of value to landholders.  | 4.14.3.1          |
| 21986               | Edward Hickson               | <b>Socio Economics:</b> The compensation offered is inadequate.   | 4.14.3.6          |
| 21986               | Edward Hickson               | <b>Socio Economics:</b> the Project will significantly impair our ability to develop eco-tourism in the area  | 4.14.3.2          |
| 21986               | Edward Hickson               | <b>Socio Economics:</b> The transmission line itself will significantly detract from the value of land as a whole and will effectively leave subdivided lots unsellable   | 4.14.3.5          |
| 21986               | Edward Hickson               | <b>Visual Assessment:</b> "The visual unsightliness... will result in financial hardship and significantly impair our ability to develop eco-tourism in the area. "   | 4.8.3.4           |
| 21986               | Edward Hickson               | <b>Biodiversity:</b> There are environmentally protected birds and animals in the area whose habitat would be distressed if this Project goes ahead.  | 4.6.3.1           |
| 21986               | Edward Hickson               | <b>Biodiversity:</b> The assessment has a variety of deficiencies which make it inadequate for approval authorities to effectively assess the impact of this development.   | 4.6.3.14          |
| 21992, 22627, 21998 | Phae Smith of Texas, QLD     | <b>Traffic and Transportation:</b> It would be extremely dangerous to operate the [school] bus run with large heavy vehicles, and the road condition is already so poor that it could not tolerate further traffic.   | 4.9.3.5           |
| 22006               | Name Withheld of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> Inadequate consideration has been given to peak usage need and uptake of alternative power sources.   | 4.2.3.5           |

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|--------------------|-------------------------------|--|--------------------|
| Submission Number  | Author                        | Comment  | Section Addressed  |
| 22008              | Steven Francis of Tenterfield | <b>Traffic and Transportation:</b> Heavy Traffic on Mole River Road will be dangerous.   | 4.9.3.2            |
| 22008              | Steven Francis of Tenterfield | <b>Visual Assessment:</b> Visual impact will decrease value of land  | 4.8.3.5            |
| 22017              | Matthew Cater of Tenterfield  | <b>Air Quality and Greenhouse Gas:</b> The Submission is concerned about dust and noise during construction  | 4.11.3.3           |
| 22017              | Matthew Cater of Tenterfield  | <b>EMF:</b> Concerned about the EMF induced health-effects on children.  | 4.13.3.1           |
| 22017              | Matthew Cater of Tenterfield  | <b>Other:</b> Suffering increased anxiety as a result of the Project   | 4.15.3.1           |
| 22017              | Matthew Cater of Tenterfield  | <b>Noise and Vibration:</b> The Submission is concerned about dust and noise during construction.<br>“.. the line is proposed to be built so close to our house that we consider the impact of dust and noise will be unbearable.” | 4.10.3.1           |
| 22017              | Matthew Cater of Tenterfield  | <b>Socio Economics:</b> Compensation is not adequate.  | 4.14.3.6           |
| 22017              | Matthew Cater of Tenterfield  | <b>Socio Economics:</b> Concern about reduction in land values   | 4.14.3.1           |
| 22017              | Matthew Cater of Tenterfield  | <b>Socio Economics:</b> There is no immediate added value to those nearest the line.   | 4.14.3.8           |
| 22017              | Matthew Cater of Tenterfield  | <b>Soils, Geology and Topography:</b> The Submission is concerned about future erosion the country, it also raises concerns that the Project uses old maps which are now incorrect in showing land use.                            | 4.4.3.2            |
| 22017              | Matthew Cater of Tenterfield  | <b>Traffic and Transportation:</b> The EA incorrectly states that the Bruxner Highway is RTA maintained.<br>The Bruxner Highway is already in a poor condition and cannot handle the increased traffic as a result of the Project  | 4.9.3.2<br>4.9.3.4 |
| 22017              | Matthew Cater of Tenterfield  | <b>Visual Assessment:</b> The line will be clearly visible from the property. “the line will be clearly visible at all times from our house...the view from our house will be very ugly. “   | 4.8.3.1            |
| 22017              | Matthew Cater of Tenterfield  | <b>Consultation:</b> our dealings with TransGrid have been unpleasant. They have never told us the full truth about their intentions, and have fobbed us off.  | 4.3.3.1            |

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| Public Submissions |                             |  |                      |
|--------------------|-----------------------------|--|----------------------|
| Submission Number  | Author                      | Comment  | Section Addressed    |
| 22027              | Kim Hamel of Tenterfield,   | <b>EMF:</b> Concerned about the EMF induced health-effects on children.  | 4.13.3.1             |
| 22027              | Kim Hamel of Tenterfield,   | <b>Noise and Vibration:</b> listed as a concern  | 4.10.3.1             |
| 22031              | James Harpham of RF Capital | <b>Other:</b> I am concerned that the Project will significantly damage the local environment. I feel money would be better spent on renewable sources of energy.  | 4.2.3.4              |
| 22606              | Andrew Hynes of Tenterfield | <b>EMF:</b> Concerned about the potential long-term EMF effects, with specific reference to the fertility of breeding livestock grazing directly under the transmission lines.   | 4.13.3.1<br>4.13.3.2 |
| 22606              | Andrew Hynes of Tenterfield | <b>Hazard Risk and Bushfire:</b> Bushfire risk from fallen lines could impact the locality (especially in bulk long grass which would be impossible to extinguish)   | 4.12.3.1             |
| 22606              | Andrew Hynes of Tenterfield | <b>Non Indigenous Heritage:</b> The submission states that no consideration was given to personal heritage.  | 4.7.3.1              |
| 22606              | Andrew Hynes of Tenterfield | <b>Socio Economics:</b> Land values surrounding the Project will be devalued.  | 4.14.3.1             |
| 22606              | Andrew Hynes of Tenterfield | <b>Socio Economics:</b> The compensation that is being offered is inadequate.  | 4.14.3.6             |
| 22606              | Andrew Hynes of Tenterfield | <b>Soils Geology and Topography:</b> Soils are fragile and subsoil here is dispersive and erode easily.  | 4.4.3.2              |
| 22606              | Andrew Hynes of Tenterfield | <b>Traffic and Transportation:</b> Some of the access tracks are incorrectly marked on the maps, also heavy traffic during lambing / calving season could lead to economic loss.   | 4.15.3.4<br>4.14.3.7 |
| 22606              | Andrew Hynes of Tenterfield | <b>Visual Assessment:</b> "This power line will be visible from almost all of the property. This will decrease aesthetic values of our open spaces and great views we have on our property. This will also have a great effect on valuation and resale of land in the district." | 4.8.3.1<br>4.8.3.5   |
| 22606              | Andrew Hynes of Tenterfield | <b>Consultation:</b> No consultation was sought from TransGrid .   | 4.3.3.1              |

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|--------------------|-----------------------------------|---|----------------------|
| Submission Number  | Author                            | Comment   | Section Addressed    |
| 22606              | Andrew Hynes of Tenterfield       | <b>Biodiversity:</b> Weed invasion will be an ongoing concern.  | 4.6.3.19             |
| 22610              | Barbara Potter of Tenterfield     | <b>Hazard, risk and Bushfire:</b> The submission states that the transmission line is at high risk of bushfires caused by lightning strike. This area is known to have the highest strike rate in Australia   | 4.12.3.1<br>4.12.3.2 |
| 22614              | Deborah Newell                    | <b>Biodiversity:</b> The native grass <i>Microlaena stipoides</i> is present in the area and would be threatened by this action.  | 4.6.3.9              |
| 22619              | JJ Spedding of Tenterfield        | <b>Project Needs, Justification and Alternatives:</b> TransGrid did not taken any account of the impact of non-network options prior to its initial proposal as mandated by section 5.6.6. the National Electricity Rules.  | 4.2.3.3              |
| 22619              | JJ Spedding of Tenterfield        | <b>Project Needs, Justification and Alternatives:</b> Nowhere in the TransGrid 's proposal takes into account the North Coast community's uptake energy saving systems, such as light bulbs, insulation, heat pumps, solar water heating and solar and wind electricity generation.   | 4.2.3.4              |
| 22619              | JJ Spedding of Tenterfield        | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's failure to take into account for alternate energy sources is a direct breach of the National Electricity Rules.  | 4.2.3.3              |
| 22619              | JJ Spedding of Tenterfield        | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's predicted energy demands are based upon population growth, rather than actual energy usage, which has according to TransGrid 's own documentation declined or remained flat over the last 3 years despite increasing population growth on the North Coast. | 4.2.3.5              |
| 22619              | JJ Spedding of Tenterfield        | <b>Socio Economics:</b> The Project will devalue the acreage of current landholders, even more significantly it will deter new purchasers from entering into the town.  | 4.14.3.1<br>4.14.3.3 |
| 22619              | JJ Spedding of Tenterfield        | <b>Biodiversity:</b> The Project will have a significant impact on EPBC Act listed communities White Box, Blakely's Red Gums, Orange Gums, Lyrebirds and Koalas.  | 4.6.3.3              |
| 22621              | Julia Harpham of Kamilaroi People | <b>Indigenous Heritage:</b> The Kamilaroi elders have not had the opportunity to come and inspect the area on Moorabinda.   | 4.7.3.2              |
| 22621              | Julia Harpham of Kamilaroi People | <b>Indigenous Heritage:</b> The Kamilaroi elders were never consulted, even though the line in the Dumaresq Valley passes over Kamilaroi lands.   | 4.7.3.3              |
| 22623              | Marie Ihle of Tenterfield         | <b>Project Needs, Justification and Alternatives:</b> Alternative renewable energy sources should be investigated   | 4.2.3.4              |
| 22623              | Marie Ihle of Tenterfield         | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's justification for the Project is based on faulty data. According to TransGrid 's documentation the energy usage has declined or remained flat over the last three years and will continue to do so for the foreseeable future                              | 4.2.3.5              |

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| Public Submissions |                             |  |                      |
|--------------------|-----------------------------|--|----------------------|
| Submission Number  | Author                      | Comment  | Section Addressed    |
| 22623              | Marie Ihle of Tenterfield   | <b>Socio Economics:</b> The Project is not consistent with the governments carbon reduction objectives.  | 4.14.3.9             |
| 22623              | Marie Ihle of Tenterfield   | <b>Visual Assessment:</b> General objection to visual amenity impacts  | 4.8.3.1              |
| 22625              | Pearl Austin of Wallangarra | <b>Noise and Vibration:</b> General point listed as a concern  | 4.10.3.1             |
| 22625              | Pearl Austin of Wallangarra | <b>EMF:</b> The EA has not appropriately shown harm-minimisation in terms of EMFs associated with the Project. This includes human health effects (due to the proximity of houses to the transmission line) and the effects on grazing livestock and native  | 4.13.3.1<br>4.13.3.2 |
| 22625              | Pearl Austin of Wallangarra | <b>Hazard, risk and Bushfire:</b> The Project has not appropriately considered Hazards and Risk Impacts that are associated with such a Project  | 4.12.3.1             |
| 22625              | Pearl Austin of Wallangarra | <b>Hazard, risk and Bushfire:</b> Victorian Government findings found that 60%+ of dangerous fires were started by Transmission lines.   | 4.12.3.1             |
| 22625              | Pearl Austin of Wallangarra | <b>Noise and Vibration:</b> There will be an impact on cattle and wildlife.  | 4.10.3.2             |
| 22625              | Pearl Austin of Wallangarra | <b>Noise and Vibration:</b> There will be an impact on cattle.   | 4.10.3.2             |
| 22625              | Pearl Austin of Wallangarra | <b>Project Needs, Justification and Alternatives:</b> Nowhere in the TransGrid 's Proposal takes into account the North Coast community's uptake energy saving systems, such as light bulbs, insulation, heat pumps, solar water heating and solar and wind electricity generation.                            | 4.2.3.4              |
| 22625              | Pearl Austin of Wallangarra | <b>Project Needs, Justification and Alternatives:</b> the Government is attempting to reduce carbon usage and. emissions when there are more ecological alternatives such as solar and wind power.   | 4.2.3.4              |
| 22625              | Pearl Austin of Wallangarra | <b>Socio Economics:</b> Adjacent landholders will suffer significant depreciation of their land. Local Real Estate agents have suggested that this could be 40–60% decline in the value for those directly affected, and a 20–40% decline for those who hold properties within view of the transmission lines. | 4.14.3.1             |
| 22625              | Pearl Austin of Wallangarra | <b>Socio Economics:</b> The Project is encouraging social inequality between coastal and inland areas.   | 4.14.3.8             |

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|--------------------|-----------------------------|--|--|
| Submission Number  | Author                      | Comment  | Section Addressed                          |
| 22625              | Pearl Austin of Wallangarra | <b>Socio Economics:</b> The Project will destroy valuable farmland   | 4.14.3.7                                   |
| 22625              | Pearl Austin of Wallangarra | <b>Socio Economics:</b> The proposed Project will devalue the acreage of landholding   | 4.14.3.1                                   |
| 22625              | Pearl Austin of Wallangarra | <b>Socio Economics:</b> Why should the people of the inland parts of Australia sacrifice their livelihoods and health for this outdated coal driven power line that will have no direct benefits for the local communities and land it will run through?   | 4.14.3.8                                   |
| 22625              | Pearl Austin of Wallangarra | <b>Visual Assessment and Socio Economics:</b> Visual Amenity Impacts of the proposed transmission line will have detrimental impacts directly on my land value and the tourism industry in the community.  | 4.8.3.4<br>4.8.3.5<br>4.14.3.2<br>4.14.3.1 |
| 22625              | Pearl Austin of Wallangarra | <b>Surface water and Hydrology:</b> EA had not considered flood damage, or isolation due to flood damage to local roads. The submission notes that both of these risks are already high in relation to natural causes eg. lightning strikes on trees and the effects of flooding. Pearl Austin believes that having the Transmission line running directly through her property will only further maximise these risks.                                  | 4.5.3.3                                    |
| 22625              | Pearl Austin of Wallangarra | <b>Traffic and Transportation:</b> There will be damage to local roads.  | 4.9.3.6                                    |
| 22625              | Pearl Austin of Wallangarra | <b>Visual Assessment:</b> “Visual Amenity Impacts of the proposed transmission line will have detrimental impacts directly on my land value and the tourism industry in the community. Apart from destroying the majestic landscape and 'local and regional views' of the Northern Tablelands, the TransGrid Project will harm the local tourist industry, which depends for its very livelihood on the pristine, unspoilt and natural local landscape.” | 4.8.3.4                                    |
| 22625              | Pearl Austin of Wallangarra | <b>Visual Assessment:</b> TransGrid has not adequately regarded Human Amenity Impacts.   | 4.8.3.1                                    |
| 22625              | Pearl Austin of Wallangarra | <b>Soils Geology and Topography:</b> There will be impacts from the maintenance of the transmission line.  | 4.4.3.1<br>4.6.3.20                        |
| 22625              | Pearl Austin of Wallangarra | <b>Biodiversity:</b> The Project will impact significantly on a number of indigenous fauna and flora listed as environmentally significant. In particular the planned route will impact on the Conservation of EPBC Act listed communities White Box, Blakely's Red Gums, Orange Gums, Lyrebirds, and Koalas.  | 4.6.3.3                                    |

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| Public Submissions |  |  |                   |
|--------------------|--|--|-------------------|
| Submission Number  | Author   | Comment  | Section Addressed |
| 22625              | Pearl Austin of Wallangarra                      | <b>Biodiversity:</b> Species found on the property of the submitter include, wedge tail eagles, quolls, whip tail wallabies, echidnas, little gliders amongst many others.   | 4.6.3.8           |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> Predicted that energy use would increase on the North Coast such that this line was a necessity. However according to TransGrid 's own data this energy demand has remained flat (or may have declined) over the last 7 years.   | 4.2.3.5           |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> There is no justification for the Project  | 4.2.3.1           |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The 2010 AER report has found shortcomings in the process conducted by TransGrid in reaching its original decision to build the line.  | 4.2.3.3           |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Basic electricity demand information on which the original proposal was based is flawed and proved to be incorrect.  | 4.2.3.5           |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Socio Economics:</b> The proposed transmission line has already reduced the value of the actual land through which the line passes but also the land which can "see" the proposed line  | 4.14.3.1          |
| 22631              | Ralph Weatherley and Sylvia Grigg of Tenterfield | <b>Biodiversity:</b> The transmission line will impact on the communities of White Box, Blakely's Red Gum, Orange gums, Lyrebirds and Koalas.  | 4.6.3.3           |
| 22633              | RS & MO Dowe of TENTERFIELD                      | <b>Hazard, risk and Bushfire:</b> The recent Victorians Government findings, 60% of dangerous fires are started by transmission lines.   | 4.12.3.1          |
| 22633              | RS & MO Dowe of TENTERFIELD                      | <b>Indigenous Heritage:</b> Some aboriginal sites are present.   | 4.7.3.4           |
| 22633              | RS & MO Dowe of TENTERFIELD                      | <b>Non-Indigenous Heritage:</b> Sites are present including the Brisbane Line.   | 4.7.3.1           |
| 22633              | RS & MO Dowe of TENTERFIELD                      | <b>Project Needs, Justification and Alternatives:</b> The TransGrid Project does not take into account the North Coast community's uptake energy saving systems, such as light bulbs, insulation, heat pumps, solar water heating and solar wing electricity generation ' this being a direct breach of the National Electricity Rules | 4.2.3.4           |

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| Public Submissions        |   |  |                      |
|---------------------------|---|--|----------------------|
| Submission Number         | Author                                  | Comment  | Section Addressed    |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Project Needs, Justification and Alternatives:</b> TransGrid did not take into account the impact of non-network options prior to its initial proposal as mandated by section 5.6.6- of The National Electricity Rules.   | 4.2.3.4              |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's predicted energy demands are based upon population growth, rather than on actual energy usage, which has according to TransGrid 's own documentation declined or remained flat over the last few years despite increasing population growth on the North coast. | 4.2.3.5              |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Socio Economics:</b> The proposed Project will devalue the acreage of current land holders, even more significantly it will deter new purchasers from entering into the adjacent areas  | 4.14.3.1<br>4.14.3.3 |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Socio Economics:</b> The transmission line will impact on environmentally friendly farming practices.   | 4.14.3.7             |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Visual Assessment:</b> The 19.5 Ha to be cleared on our property, predominantly along the top of two ridges, are areas of significant scenic and visual value.  | 4.8.3.1              |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Biodiversity:</b> Concern over loss of habitat connectivity and implications loss of habitat will have on Koalas within the region.   | 4.6.3.2<br>4.6.3.5   |
| 22633                     | RS & MO Dowe of TENTERFIELD             | <b>Biodiversity:</b> The proposed route will impact on the conservation of EPBC Act listed communities, White Box, Blakely's Red Gums, Orange Gums, Lyrebirds and Koalas.  | 4.6.3.3              |
| 22637,<br>21990,<br>21988 | Simon Clough of Sustain Northern Rivers | <b>Other:</b> Objects to this Project  | No response needed   |
| 22637,<br>21990,<br>21988 | Simon Clough of Sustain Northern Rivers | <b>Project Needs, Justification and Alternatives:</b> Large scale photovoltaic may have reached price parity with coal fired electricity   | 4.2.3.4              |
| 22637,<br>21990,<br>21988 | Simon Clough of Sustain Northern Rivers | <b>Project Needs, Justification and Alternatives:</b> Metgasco's approval for a 30MW gas fired electricity plant south of Casino has been overlooked   | 4.2.3.4              |
| 22637,<br>21990,<br>21988 | Simon Clough of Sustain Northern Rivers | <b>Project Needs, Justification and Alternatives:</b> The figures provided by the Institute of Sustainable Futures (UTS) show conclusively that at minimum this Project is nine (9) times more expensive than its less energy demanding alternatives and at a maximum twenty (20) times more expensive.                            | 4.2.3.6              |

## Appendix A - Summary of Submissions

| Public Submissions  |  |   |                                 |
|---------------------|--|---|---------------------------------|
| Submission Number   | Author                                   | Comment   | Section Addressed               |
| 22637, 21990, 21988 | Simon Clough of Sustain Northern Rivers  | <b>Project Needs, Justification and Alternatives:</b> The submission states that TrasGrid should: <ul style="list-style-type: none"> <li>• Shelve its transmission line Project,</li> <li>• Collaborate with community organisations which have shown the commitment and capacity to reduce the areas dependence on coal fired electricity,</li> <li>• Institute an effective demand management system that uses both technology and education,</li> <li>• Ensure support for renewable forms of energy in the region.</li> </ul> | 4.2.3.4                         |
| 22637, 21990, 21988 | Simon Clough of Sustain Northern Rivers  | <b>Project Needs, Justification and Alternatives:</b> there is a likely decrease in demand for electricity from the impact of carbon pricing  | 4.2.3.5                         |
| 22637, 21990, 21988 | Simon Clough of Sustain Northern Rivers  | <b>Project Needs, Justification and Alternatives:</b> TransGrid could much more effectively spend the money proposed for the transmission line in supporting regional organisations seeking to reduce nonrenewable energy consumption by 20% by 2020. We believe these community organisations in collaboration with TransGrid have the capacity and the passion to deliver better energy outcomes.   | 4.2.3.4<br>4.2.3.6              |
| 22637, 21990, 21988 | Simon Clough of Sustain Northern Rivers  | <b>Project Needs, Justification and Alternatives:</b> TransGrid have failed to trial demand management in this region   | 4.2.3.4                         |
| 22641               | Colin & Helen Chevalley of Tenterfield , | <b>Project Needs, Justification and Alternatives:</b> Trans Grid has not fulfilled the following mandatory requirements Trans Grid did not take into account of the impact of non-network options prior to its initial proposal as mandated by section 5.6.6 of the national Electricity Rules  | 4.2.3.3<br>4.2.3.4              |
| 22641               | Colin & Helen Chevalley of Tenterfield , | <b>Socio Economics:</b> The introduction of weeds may well have a detrimental effect on our livestock.  | 4.6.3.19                        |
| 22641               | Colin & Helen Chevalley of Tenterfield , | <b>Socio Economics:</b> There have been indications that cattle that are grazed beneath the lines may well not be readily acceptable in the market place in the future.   | 4.13.3.2                        |
| 22641               | Colin & Helen Chevalley of Tenterfield , | <b>Socio-Economic:</b> The visual impact that this line will cause not only to ourselves but to the many tourists and new comers to the district.   | 4.8.3.4<br>4.14.3.2<br>4.14.3.3 |

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| Public Submissions |   |   |                      |
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| Submission Number  | Author                                      | Comment   | Section Addressed    |
| 22641              | Colin & Helen Chevalley of Tenterfield ,    | <b>Soils, Geology and Topography:</b> Erosion will be caused by any increase in traffic through the land.   | 4.4.3.2              |
| 22641              | Colin & Helen Chevalley of Tenterfield ,    | <b>Traffic and Transportation:</b> We have concerns that the additional vehicular traffic on our local gravel roads will cause further damage to a road system that is already under stress.  | 4.9.3.6              |
| 22641              | Colin & Helen Chevalley of Tenterfield,     | <b>Socio Economics:</b> Current land and future uses will be impacted by the development.   | 4.14.3.5<br>4.14.3.7 |
| 22641              | Colin & Helen Chevalley of Tenterfield, NSW | <b>Visual Assessment:</b> We have concerns for the visual impact that this line will cause not only to ourselves but to the many tourists and new comers to the district. People move to the district for the pleasant rural atmosphere.”   | 4.8.3.4              |
| 22643              | Deborah Adam of Tenterfield                 | <b>Project Needs, Justification and Alternatives:</b> My objection to this Project is the exorbitant cost of this Project as per the Rutovitz J, Harris S, and Dunstan D, 2011 TransGrid proposal for a new Dumaresq to Lismore transmission line: commentary on Project need.  | 4.2.3.6              |
| 22648              | Sandor von Kontz of Tenterfield             | <b>Other:</b> The threat of the line going through their valley, has caused considerable stress anxiety and depression.   | 4.15.3.1             |
| 22648              | Sandor von Kontz of Tenterfield             | <b>Air Quality and Greenhouse Gas:</b> On page 38 of the main report TransGrid claims, the Project will save 33.000 tons of CO <sub>2</sub> per year due to increased efficiency of the network. This is completely ludicrous.  | 4.11.3.1             |
| 22648              | Sandor von Kontz of Tenterfield             | <b>Consultation:</b> At the first meeting here on the western side, the line was presented as a fait accompli.  | 4.3.3.3              |
| 22648              | Sandor von Kontz of Tenterfield             | <b>Consultation:</b> One of the requirements of the Director General was " to undertake an appropriate and justified level of consultation ....with each landowner and land occupier within and adjacent to the corridor of the proposed development...". TransGrid has never contacted him or offered any compensation. The line does not run through his property, but adjacent to it, while the landholder, through whose property it runs, lives in another valley. | 4.3.3.4              |
| 22648              | Sandor von Kontz of Tenterfield             | <b>Consultation:</b> The public has been treated patronisingly and with arrogance. Questions asked regarding the need, the consumption figures and alternatives were not answered.  | 4.3.3.3              |

## Appendix A - Summary of Submissions

| Public Submissions |                                 |   |                                 |
|--------------------|---------------------------------|---|---------------------------------|
| Submission Number  | Author                          | Comment   | Section Addressed               |
| 22648              | Sandor von Kontz of Tenterfield | <b>Hazard Risk and Bushfire:</b> Power lines are a major cause for bushfires. Submission raises concerns over bushfire intensity scores in the bushfire assessment surrounding his property.  | 4.12.3.1                        |
| 22648              | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The powerline has nothing to do with covering the peak hour demand of the Far North of NSW. It aims to create the necessary infrastructure to go on with business as usual, meaning centralised coal/gas fired power supply. TransGrid have a vested interest as a Corporation to continue to operate in the way they were originally set up.   | 4.2.3.4<br>4.2.3.5              |
| 22648              | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> State that the "AER is concerned that there is a systemic bias towards inflated forecasts because of the framework for establishing forecasts of required capital and operating expenditure." The network limitations anticipated by TransGrid are the result of Projected increases in end-user demand over the next decade. However, there is widespread evidence that TransGrid consistently overestimates demand forecasts. Need in the region is decreasing."  | 4.2.3.5                         |
| 22648              | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The Request for Proposals was an afterthought forced onto TransGrid by the result of the Investigation by the AER. Not only did it come far too late to comply with the NER, it does not comply with the rules in its substance either.   | 4.2.3.3                         |
| 22648              | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> TransGrid has failed badly to comply with the NER to describe all reasonable network and non-network alternatives to address the identified constraint  | 4.2.3.3<br>4.2.3.4              |
| 22648              | Sandor von Kontz of Tenterfield | <b>Socio Economic:</b> The proposed line has already had an impact on the real estate market for properties along the Western corridor. In addition, the value of properties along the corridor will be reduced by the advent of the powerline. It is clear that some people are currently being economically disadvantaged by the Project. Regional economics will feel a flow-on effect from the stagnation of the rural real estate market and the unwillingness of property owners in general to make any further capital investment in their properties. The visual impact of the power line will affect regional tourism. | 4.8.3.4<br>4.14.3.1<br>4.14.3.2 |
| 22648              | Sandor von Kontz of Tenterfield | <b>Socio Economic:</b> The threat of the line has caused him considerable stress anxiety and depression.  | 4.15.2.1                        |
| 22648              | Sandor von Kontz of Tenterfield | <b>Socio Economics:</b> The construction of the line also flies into the face of all the attempts of state and federal governments to reduce greenhouse gas emissions, support of lower power consumption, energy efficiency measures etc.  | 4.14.3.9                        |
| 22648              | Sandor von Kontz of Tenterfield | <b>Socio Economics:</b> The submission states that the value of his property has decreased severely. States that his neighbour accepted a substantial offer for the paddock adjacent to my place, a very similar property. When the prospective buyer heard about the possibility of the power line going in front of his nose he withdrew the offer.   | 4.14.3.1                        |

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| Public Submissions |                                 |   |                               |
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| Submission Number  | Author                          | Comment   | Section Addressed             |
| 22648              | Sandor von Kontz of Tenterfield | <b>Surface Water and Hydrology:</b> Incorrect classification of surface water features. Table 8.2 on p183 Main report Vol. 1 fails to identify Reedy Creek as a class 2 creek.  | 4.5.3.2                       |
| 22648              | Sandor von Kontz of Tenterfield | <b>Traffic and Transportation:</b> Access tracks – Increase the likelihood of unauthorised shooters and pig hunters, and theft of animals. The frequent use of those tracks by maintenance personnel and the above mentioned unauthorised visitors also opens up a highway for environmental weeds to come to the, until now, uninfested back blocks.   | 4.15.3.5                      |
| 22648              | Sandor von Kontz of Tenterfield | <b>Visual Assessment:</b> "In Volume 2 Appendix H the "visual receptors" are defined and listed. On page 38 just south of AP15 between R7 and R8 I should be listed. But I do not exist for TransGrid even though the line would be in plain view from my entrance."  | 4.8.3.2                       |
| 22648              | Sandor von Kontz of Tenterfield | <b>Visual Assessment:</b> "The 1 km offset each side of the line is inappropriate. In the Reedy Creek valley the line will be a dominant spoiling feature for many kilometers around. This will have a major negative impact on tourism and land values."   | 4.8.3.2<br>4.8.3.4<br>4.8.3.5 |
| 22648              | Sandor von Kontz of Tenterfield | <b>Visual Assessment:</b> Purchased his property to set up place of retirement, due to its remoteness and seclusion. The location of the proposed transmission line right in front of his property defeats this purpose.  | 4.8.3.1                       |
| 22648              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> The Project has unacceptable impacts on matters of national environmental significance. Statement based on the rationale that likely economic and social benefits of this Project do not outweigh the serious environmental impacts on our nationally protected species.   | 4.6.3.3                       |
| 22648              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Submission states that he has observed the Squatter Pigeon, Spotted Tailed Quoll and the Brush Tailed Rock Wallaby on his property – despite the Biodiversity report stating that 'No threatened species listed under the EPBC act were recorded during the survey of the study area.' (p 141)'.   | 4.6.3.8                       |
| 22648              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Use of access tracks by maintenance personnel and any unauthorised visitors is likely to result in an increase of weeds spread through vehicle movements etc. Currently the submission's property is weed free due to its inaccessibility.   | 4.6.3.19                      |
| 22648              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> The submission objects to the imposition of chemical methods of vegetation control being used in proximity to his residence. The submission refers to the reference to 'Vegetation Clearing Protocol (Main Report Vol. 1 p. 123)' - The method of chemical control mentioned in this section is of concern. The submission states it is an infringement of their right to enjoy their property, by having their environment poisoned by chemicals. | 4.6.3.19                      |
| 22648              | Sue Higginson of EDO            | <b>Project Needs, Justification and Alternatives:</b> At the same time that TransGrid is planning this Project, Metgasco is seeking planning approval to build a pipeline to transport gas from Casino to Ipswich to fuel a gas-fired power station. The AER is possibly in the best position to intervene to correct this classic example of poor infrastructure planning.   | 4.2.3.4                       |

## Appendix A - Summary of Submissions

| Public Submissions |                               |  |                      |
|--------------------|-------------------------------|--|----------------------|
| Submission Number  | Author                        | Comment  | Section Addressed    |
| 22648              | Sue Higginson of EDO          | <b>Project Needs, Justification and Alternatives:</b> TransGrid and Country Energy have erred in claiming in the Final Report to have “applied the regulatory test to all known reasonable options to meet the network limitations described”, since the Final Report has not given adequate consideration to current and potential demand management and local generation options.  | 4.2.3.4              |
| 22648              | Sue Higginson of EDO          | <b>Project Needs, Justification and Alternatives:</b> The only serious consideration given by TransGrid to options to reduce reliability constraints were those available within its own current business model and network, in partnership with Country Energy as the monopoly distribution network service provider.   | 4.2.3.4              |
| 22648              | Sue Higginson of EDO          | <b>Project Needs, Justification and Alternatives:</b> The network limitations anticipated by TransGrid are the result of Projected increases in end-user demand over the next decade. However, there is widespread evidence that TransGrid consistently overestimates demand forecasts.  | 4.2.3.5              |
| 22648              | Sue Higginson of EDO          | <b>Project Needs, Justification and Alternatives:</b> TransGrid is required under the Energy Services Corporations Act 1995 (NSW) “To protect the environment by conducting its operations in compliance with the principles of ecologically sustainable development.”. To this end, and bearing in mind that well over 80 per cent of the power TransGrid transmits is still generated by coal-fired power stations, the \$227 million of NSW energy consumers’ money TransGrid is planning to spend on new transmission lines could instead be spent on initiatives to improve DM and LG on the FNC, and to reduce the carbon footprint of TransGrid’s operations. | 4.2.3.4              |
| 22803              | Peter Spedding of Tenterfield | <b>Consultation:</b> TransGrid have lied to landowners, entered properties when refused access, made compensation offers to some land owners before the final line easement was decided as their plan on display showed the proposed preferred easement to be 500m. Overall concerns regarding communication.  | 4.3.3.3              |
| 22803              | Peter Spedding of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> States that TransGrid’s 2011 Annual Planning Report forecast for demand to justify the Project is not being taken seriously. The government could save a lot of money if the Project was shelved.  | 4.2.3.1              |
| 22803              | Peter Spedding of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The A.E.R. enquiry into TransGrid’s proposed network found they breached the Act in Section 5.6.6, but also failed in many other areas.  | 4.2.3.3              |
| 22803              | Peter Spedding of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The powerlines should be located underground as advantages would include no visual pollution, less storm damage, less maintenance. It states that TransGrid did not look into this option.   | 4.2.3.4              |
| 22803              | Peter Spedding of Tenterfield | <b>Socio Economics:</b> Major concerns over land devaluation of properties, not only where the line is placed, but other nearby landowners are not going to be compensated at all. It was raised that a once off payment is not enough. Landowners should be compensated by regular payment as rent for the easement for as long as it remains.  | 4.14.3.1<br>4.14.3.6 |

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|--------------------|-------------------------------|--|----------------------|
| Submission Number  | Author                        | Comment  | Section Addressed    |
| 22803              | Peter Spedding of Tenterfield | <b>Biodiversity:</b> Concerns that noxious and other weeds will continue to be spread by contractors   | 4.6.3.19             |
| 22824 (attachment) | Julia Harpham                 | <b>Air Quality:</b> The Project increases reliance on coal fired power generation.   | 4.11.3.2             |
| 22824 (attachment) | Julia Harpham                 | <b>Air Quality:</b> Dust impacts from construction traffic will affect local residences.   | 4.11.3.3             |
| 22824 (attachment) | Julia Harpham                 | <b>Project Needs, Justification and Alternatives:</b> The proposal is inadequate in that it does not comply with AER.  | 4.2.3.3              |
| 22824 (attachment) | Julia Harpham                 | <b>Noise and Vibration:</b> Vehicles on the unsealed roads (specifically Reedy Creek Road) will create noise, vibration and dust and cause damage to the road surface which TransGrid are not proposing to repair.   | 4.10.3.1<br>4.10.3.3 |
| 22824 (attachment) | Julia Harpham                 | <b>Noise and vibration:</b> The attached email raises a concern about construction noise impacts impacting the local area and negatively impacting the many rare and protected species which occur within the easement.<br>"Noise from the building using jackhammers etc as described in the proposal will affect animals grazing within the area, and negatively impact the many rare and protected species which occur within the easement, and whose habitat we would like to see protected" | 4.10.3.2             |
| 22824 (attachment) | Julia Harpham                 | <b>Noise and Vibration:</b> The proposal states that there would be no major effect on households due to noise, vibrations or reduced air quality – The community shall be quite severely affected.  | 4.10.3.1<br>4.10.3.3 |
| 22824 (attachment) | Julia Harpham                 | <b>Surface Water and Hydrology:</b> General objection on the grounds of surface water impacts  | 4.5.3.1              |
| 22824 (attachment) | Julia Harpham                 | <b>Surface Water and Hydrology:</b> In the proposal it is stated that nowhere crossing the proposed line is there a likelihood of flood – untrue, Beady River, Reedy Creek and Mole River would all have flooded across the proposed sites of pylons.  | 4.5.3.3              |
| 22824 (attachment) | Julia Harpham                 | <b>Visual Assessment:</b> The proposal states that beyond a 1km view catchment the transmission line would not be a major landscape feature. The Westlink line is clearly visible from 10 km away. Subsequently, there are a number of dwellings which would be negatively affected.   | 4.8.3.2              |
| 22824 (attachment) | Julia Harpham                 | <b>Biodiversity:</b> The assessment has missed at least one threatened community; Dry Rainforest.  | 4.6.3.16             |

## Appendix A - Summary of Submissions

| Public Submissions |               |   |                   |
|--------------------|---------------|---|-------------------|
| Submission Number  | Author        | Comment   | Section Addressed |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Noise from the building using jackhammers etc as described in the proposal will negatively impact the many rare and protected species which occur within the easement.   | 4.6.3.7           |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Potential for an increase in Hendra virus due to increased stress levels in flying fox populations resulting from removal of habitat.  | 4.6.3.10          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> The health effects of powerlines on native wildlife, many of whom are rare and endangered, have never been studied.  | 4.6.3.11          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> The assessment states only vaccinated ecologists with lyssavirus inoculation would handle microbats. There is no such thing as a dedicated lyssavirus inoculation, it is actually a rabies virus anti- toxin usually administered as an anti-dote.   | 4.6.3.13          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> A number of threatened ecological communities and species have been omitted from survey and/or assessment  | 4.6.3.16          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Departmental guidelines for threatened species surveys were not followed adequately.   | 4.6.3.16          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Dry Rainforest is a regionally significant vegetation community which is commonly found in disjunct patches in sheltered gullies along the western alignment. This regionally significant community should have been targeted in searches as it is habitat for a number of threatened flora species.               | 4.6.3.16          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Dry Rainforest is a regionally significant vegetation community but missed out in assessment   | 4.6.3.16          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> The ecological impact assessment and survey methodology are inadequate.  | 4.6.3.16          |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> The sampling method employed to map threatened flora and fauna groups is inadequate and many communities have been omitted. These include: <ul style="list-style-type: none"> <li>• Dry Rainforest,</li> <li>• Ribbon Gum,</li> <li>• Mountain Gum,</li> <li>• Snow Gum and</li> <li>• Inland Grey Box.</li> </ul> | 4.6.3.16          |

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| Public Submissions |               |  |                      |
|--------------------|---------------|--|----------------------|
| Submission Number  | Author        | Comment  | Section Addressed    |
|                    |               | <p>Similarly threatened fauna is also present, the following are examples of fauna that has been sighted in the area:</p> <ul style="list-style-type: none"> <li>• Brown Tree Creepers,</li> <li>• Grey Crowned Babblers,</li> <li>• Squatter Pigeons</li> <li>• Diamond Firetails</li> <li>• Red Goshawk,</li> <li>• Spotted Harrier</li> <li>• Little Eagle</li> <li>• Square Tailed Kite</li> <li>• Black tailed Cockatoos</li> <li>• Spotted Tailed Quoll</li> </ul> | 4.6.3.16             |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Inexperienced survey staff during ecology survey were unable to identify a number of species.   | 4.6.3.18             |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> There are several incorrect statements within the ecological assessment, this includes the stated need for ecologists to be vaccinated with Lyssavirus inoculation.   | 4.6.3.13             |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Landholders are very concerned about fragmentation of habitat and loss of trees.  | 4.6.3.5              |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Landholders are very concerned about the impact of noxious weeds.   | 4.6.3.19             |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Weeds and future erosion have been identified as issues in the assessment, but the Project does not adequately address how much future work will be done over the easements life, and it is likely that landholders will have ongoing issues with faults which occur and TransGrid 's obligations being fulfilled.  | 4.6.3.19<br>4.6.3.20 |
| 22824 (attachment) | Julia Harpham | <b>Biodiversity:</b> Concern that rehabilitation of disturbed areas will be unsuccessful, as the soil within the easement does not respond well to disturbance.  | 4.6.3.20             |

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| Public Submissions |               |   |                               |
|--------------------|---------------|---|-------------------------------|
| Submission Number  | Author        | Comment   | Section Addressed             |
| 22824 (attachment) | John Rodwell, | <b>Project Needs, Justification and Alternatives:</b> If the Project is approved, our region would be presented with a major disturbance to the environment and this disturbance is based on unacceptable planning and justification. No-one would build a costly and environmentally unfriendly piece of infrastructure without very strong justification. There is no justification. (John Rodwell refers to the AER 2010 report which is summarised in Submission Number 21948). | 4.2.2.1<br>4.2.3.1            |
| 22824 (attachment) | John Rodwell, | <b>Project Needs, Justification and Alternatives:</b> John Rodwell, Media Officer from TAG writes in support of UDAG's submission. Also re states that the Project does not satisfy the National Energy Rules as laid out by the Australian Energy Regulator. Put simply, TransGrid did not investigate alternatives as required. The so-called "Request for Proposals" was only issued after TransGrid was investigated by the AER (following referral from UDAG and TAG).         | 4.2.3.3<br>4.2.2.2<br>4.2.2.5 |
| 22824 (attachment) | Julia Harpham | <b>Consultation:</b> "TransGrid is still following the practice of one-by-one basis negotiations, and making landowners sign a privacy agreement with them to not disclose the amounts being offered to each landholder...."  | 4.3.3.3                       |
| 22824 (attachment) | Julia Harpham | <b>Consultation:</b> General inadequacy   | 4.3.3.1                       |
| 22824 (attachment) | Julia Harpham | <b>Consultation:</b> TransGrid uses harassment and bullying techniques, and landowners are not made aware of their rights. At present they are trying to intimidate landowners into signing agreements even though this Project has not been passed by the Planning Department."  | 4.3.3.3                       |
| 22824 (attachment) | Julia Harpham | <b>EMF:</b> The effects of EMF's on cow and sheep fertility, and to crops grown in proximity to the line have not been properly researched.   | 4.13.3.2                      |
| 22824 (attachment) | Julia Harpham | <b>Socio Economics:</b> land Values would fall as a result of the Project   | 4.14.3.1                      |
| 22824 (attachment) | Julia Harpham | <b>Socio Economics:</b> Tourism will be affected by the Project   | 4.14.3.2                      |
| 22824 (attachment) | Julia Harpham | <b>Hazard, Risk and Bushfire:</b> The TransGrid proposal plays down the real threat of bushfires, places the likelihood as quite low, and does not take in to account the lack of a localized Disaster Plan for us as landholders to access in the event of a crisis.   | 4.12.3.1                      |
| 22824 (attachment) | Julia Harpham | <b>Indigenous Heritage:</b> The line was not adequately surveyed for aboriginal heritage, and Kamilaroi people were not consulted.  | 4.7.3.3                       |
| 22824 (attachment) | Julia Harpham | <b>Soils Geology and Topography:</b> There is fear that any disturbance to the soil, however minimal, will require ongoing work for years to remove the damage. Any rehabilitation work will be slip-shod and not on-going. The residents will be left with the expense of rehabilitation of land underneath the power lines.   | 4.4.3.1                       |

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|--------------------|----------------------------|--|----------------------|
| Submission Number  | Author                     | Comment  | Section Addressed    |
| 23073              | Sandra Smith of Mole River | <b>EMF:</b> The need to earth gates and fences under the lines is an indication of there being a concern about the health-effects generated by EMFs to those that will have to work under the line and livestock.<br>Associated concern over the risk to livestock (still births/deformity) associated with transmission lines.  | 4.13.3.1<br>4.13.3.2 |
| 23073              | Sandra Smith of Mole River | <b>Project Needs, Justification and Alternatives:</b> Non-network alternatives to the construction of the line were never sought. Non-network alternatives to the construction of the line were never sought. A Request for Proposals was put out very belatedly i.e. May 2010 for potential service providers to supply electricity for any excess demand that might occur in the annual peak period before the completion of the Dumaresq-Lismore transmission line. TransGrid therefore did not comply with the National Electricity Rules (clause 5.6.6) in this matter. | 4.2.3.3<br>4.2.3.4   |
| 23073              | Sandra Smith of Mole River | <b>Project Needs, Justification and Alternatives:</b> TG has not adhered to the recommendations of the Eastlink Enquiry.   | 4.11.3.1             |
| 23073              | Sandra Smith of Mole River | <b>Project Needs, Justification and Alternatives:</b> The needs of the area would be better met by decentralised means.  | 4.2.3.4              |
| 23073              | Sandra Smith of Mole River | <b>Project Needs, Justification and Alternatives:</b> The Project is not justified. Forecast future demand on the Far North Coast has been grossly overestimated/exaggerated. TG originally warned of supply shortfalls by 2012 and now they have put this out to 2018-2020. Forecast demand has fallen substantially.   | 4.2.3.5              |
| 23073              | Sandra Smith of Mole River | <b>Project Needs, Justification and Alternatives:</b> There are cheaper, more environmentally responsible alternatives to spending at least \$227m of taxpayers' and electricity consumers' money.   | 4.2.3.4              |
| 23073              | Sandra Smith of Mole River | <b>Socio Economic:</b> Livestock would be disrupted during the construction process.   | 4.14.3.7             |
| 23073              | Sandra Smith of Mole River | <b>Socio Economics:</b> the needs of the coastal areas are being met at the cost of those who live inland.   | 4.14.3.8             |
| 23073              | Sandra Smith of Mole River | <b>Socio Economics:</b> There will be impacts on future subdivisions and devaluation of land.  | 4.14.3.5<br>4.14.3.1 |
| 23073              | Sandra Smith of Mole River | <b>Traffic and Transportation:</b> Access tracks would allow hunters and trespassers into the property.  | 4.15.3.5             |
| 23073              | Sandra Smith of Mole River | <b>Traffic and Transportation:</b> There would be damage to roads as a result of construction traffic.   | 4.9.3.6              |

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| Public Submissions |                                 |  |                     |
|--------------------|---------------------------------|--|---------------------|
| Submission Number  | Author                          | Comment  | Section Addressed   |
| 23073              | Sandra Smith of Mole River      | <b>Visual Assessment:</b> "Because the line crosses diagonally across our property, we would be able to see part of it from almost everywhere. There would be 16 structures on our place and we would also be able to see quite clearly another 7 on our neighbours' properties. All our good viewing points where we take visitors would have their views ruined by the line and the scars in the landscape caused by the roads that would be constructed to build and service the line." | 4.8.3.1             |
| 23073              | Sandra Smith of Mole River      | <b>Biodiversity:</b> The proposed line passes over country that it would be a travesty to clear regardless of whether or not there are threatened species involved.  | 4.6.3.1             |
| 23073              | Sandra Smith of Mole River      | <b>Biodiversity:</b><br>Weeds would be introduced as a result of earth moving gear.  | 4.6.3.19            |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Concerns for the Grey Headed Flying Fox <i>Pteropus Poliocephalus</i> , which is seen regularly on his property relating to increased threats to this species due to clearing and fragmentation of remnant forest and "other vegetation remnants used for roosting sites." (Threatened Species of the New England Tablelands and North West Slopes of NSW ;NSW NPWS 2003), which is likely to happen if the Project is to go ahead.                                   | 4.6.3.2             |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Strongly believes that the Project will significantly affect the ecological communities and fauna and flora species listed in the EIA.  | 4.6.3.1             |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> I am particularly worried about the White Box, Yellow Box, Blakely's Red Gum Woodland around Reedy Creek, and the potential for construction and ongoing maintenance to result in an increase to the risk of the importation of weeds and diseases which may affect it.   | 4.6.3.3<br>4.6.3.19 |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> There are risks to Squatter Pigeon <i>Geophaps Scripta</i> and the Turquoise Parrot <i>Neophema Pulchella</i> , which breeds on his property near to the proposed line.   | 4.6.3.2             |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Spotted- tailed Quoll is seen on his property, and concerns are held that the main threat to it is "loss of habitat through clearing." (NPWS 2003) which is likely due to the proposed line.  | 4.6.3.8             |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> The Brush-tailed Rock Wallaby is frequently seen in the proposed corridor and is threatened by "loss and fragmentation of habitat"(NPWS 2003) through clearing and frequent fires, both of which are likely due to the proposed line.   | 4.6.3.8<br>4.6.3.5  |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Transmission lines present a danger to birdlife – they act to disorientate wildlife.  | 4.6.3.11            |

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| Public Submissions |                                 |  |                                  |
|--------------------|---------------------------------|--|----------------------------------|
| Submission Number  | Author                          | Comment  | Section Addressed                |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> There is no mention of the impact of the presence of the HV line on flora and fauna and the ecological balance of the highly sensitive woodlands within the Project area. There is still not enough scientific data on the impact of HV transmission lines on the environment to completely ignore the possibility of significant impacts.. The precautionary principle should be applied and therefore an impact on the listed communities and species considered as likely. (See the comments of the Parliament of Australia: Senate: Committees: Economics Committee: Eastlink 1996 Chapters 2, 3 and 4 on similar issues.)  | 4.6.3.11                         |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> The ecological assessors have not been on Moorabinda a rather large property on the corridor and one of the very few in the world where the Ovenden's Ironbark <i>Eucalyptus caleyi</i> subsp. <i>ovendinii</i> occurs. Any threat to this extremely rare tree is very significant. According to NPWS (2003) the main threats are <ul style="list-style-type: none"> <li>• "Invasion of habitat by invasive introduced grasses..."</li> <li>• "Clearing and fragmentation of grassy woodland.."</li> <li>• "Frequent fires"</li> </ul> The recommended conservation actions are the prevention of the above actions, i.e. the prevention of the building of the line. | 4.6.3.16                         |
| 23459              | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> TransGrid fails to point out the danger of the introduction of weeds and other noxious plants and disease species as well as ignoring the impact the line will have on the listed species and communities once it is up and running.  | 4.6.3.19<br>4.6.3.20             |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>EMF:</b> people who own land through which high voltage power lines traverse may have difficulty in 'prudently avoiding' those lines while carrying out the normal activities that their farming enterprise requires  | 4.13.3.1                         |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>EMF:</b> simply the fear of detrimental health effects, whether real or imaginary, is in itself having an impact on the lives of some individuals affected by the Eastlink Project.   | 4.13.3.1                         |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The development of a national grid must not preclude the further development of options such as demand management, cogeneration and new technologies.  | 4.2.3.4                          |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Socioeconomics:</b> public perception that there might be an effect can have an impact on the market value of stock and crops produced in areas through which high voltage power lines pass.  | 4.14.3.7                         |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Socioeconomics:</b> Regional economics may feel a flow on effect from the stagnation of the rural real estate market and the unwillingness of property owners in general to make any further capital investment in the properties. The visual impact of the power line may also affect regional tourism.  | 4.14.3.1<br>4.14.3.2<br>4.14.3.5 |

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| Public Submissions |                                 |   |                   |
|--------------------|---------------------------------|---|-------------------|
| Submission Number  | Author                          | Comment   | Section Addressed |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> At the time of the Owen Inquiry, a potential energy generation shortfall was identified of 2,500 GWh in 2013/14. This shortfall was expected to rise to 11,600 GWh by 2020. However, these forecasts have since been substantially revised. The Projected shortfall now only appears in 2017, and by 2020 reaches only 3,800 GWh <sup>1</sup> .   | 4.2.3.5           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The NSW Government should adopt a target of meeting all forecast growth in energy consumption and peak demand between 2010 and 2020 from “green” energy sources; that is, renewable energy and Distributed Energy (including energy efficiency, demand side response, and cogeneration).  | 4.2.3.4           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The NSW Government should encourage its distribution network businesses to accelerate the deployment of smart meters and the introduction of time-of-use pricing, (including dynamic peak pricing at times of very high demand offset by lower prices at other times). It should also encourage TransGrid to reform transmission network pricing to strongly reflect peak load events in its prices                   | 4.2.3.4           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The NSW Government should maximise incentives for Distributed Energy by ... encouraging NSW Government-owned electricity network operators to redirect part of their capital budgets towards incentives for Distributed Energy.   | 4.2.3.4           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> Demand management in the NEM could assist in improving energy efficiency. Some observers believe that despite existing demand-side measures, the way in which the National Electricity Market is currently structured favours new supply when responding to increases in demand for electricity, rather than managing demand  | 4.2.3.4           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> The NSW <i>Electricity Supply Act</i> 1995 requires that before extending or increasing the capacity of its distribution network, a Distribution Licence Holder must carry out investigations to ascertain whether it would be cost-effective to avoid or postpone the expansion by implementing demand management. In NSW, this requirement is repeated in the licence conditions imposed by the Minister for Energy | 4.2.3.3           |
| 23459 (attachment) | Sandor von Kontz of Tenterfield | <b>Project Needs, Justification and Alternatives:</b> Demand management is not being utilised to its fullest extent and could replace network augmentation to ensure the stability of supply.   | 4.2.3.4           |
| 23626              | William Harpham of Kobbie Creek | <b>Project Needs, Justification and Alternatives:</b> If the conclusions of the report are even half accurate TransGrid has either behaved in a manner that is reckless (in putting forward substandard justifications) or worse (i.e. putting forward justifications it knows to be false or misleading).  | 4.2.3.3           |
| 23626              | William Harpham of Kobbie Creek | <b>Project Needs, Justification and Alternatives:</b> it appears that both the justification for the Project and the supporting EIS documentation is thoroughly flawed.   | 4.2.3.1           |

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| Public Submissions |  |   |                   |
|--------------------|--|---|-------------------|
| Submission Number  | Author   | Comment   | Section Addressed |
| 23626              | William Harpham of Kobbie Creek                              | <b>Socioeconomics:</b> disturbance to farming activities during and post construction   | 4.14.3.7          |
| 23626              | William Harpham of Kobbie Creek                              | <b>Socioeconomics:</b> substantial reduction in property value  | 4.14.3.1          |
| 23626              | William Harpham of Kobbie Creek                              | <b>Visual Assessment:</b> reduction in general amenity (both aural and visual);   | 4.8.3.1           |
| 23626              | William Harpham of Kobbie Creek                              | <b>Biodiversity:</b> the transmission line destroying fauna and flora and then effectively severing fauna and flora corridors.  | 4.6.3.5           |
| 23626              | William Harpham of Kobbie Creek                              | <b>Biodiversity:</b> fundamental flaws identified in the Biodiversity Report indicate that the report was either prepared on a shoestring budget or it was prepared by persons who did not, or were not allowed to, undertake a proper assessment.  | 4.6.3.14          |
| 23626              | William Harpham of Kobbie Creek                              | <b>Biodiversity:</b> The Biodiversity report is an inadequate document on which to base any assessment of the potential impacts of this development.  | 4.6.3.14          |
| 23766              | Sandor von Kontz of Tenterfield                              | <b>Air Quality and Greenhouse Gas:</b> The clearance of native woodland in favour of greenhouse gas producing centralised power sources is contrary to the objectives of the Kyoto Agreement.   | 4.11.3.1          |
| 23766              | Sandor von Kontz of Tenterfield                              | <b>EMF:</b> There is still not enough scientific data on the impact of HV transmission lines on the environment to completely ignore the possibility of significant impacts.. The precautionary principle should be applied and therefore an impact on the listed communities and species considered as likely                | 4.13.3.4          |
| 23766              | Sandor von Kontz of Tenterfield                              | <b>Project Needs, Justification and Alternatives:</b> There are existing alternatives which could meet the predicted growth in demand for power in Northern NSW (e.g. a combination of local networks and renewables)   | 4.2.3.4           |
| 23766              | Sandor von Kontz of Tenterfield                              | <b>Project Needs, Justification and Alternatives:</b> there is absolutely no need for more centralized transmitted power generated by coal fired power stations to meet the future demands of NSW   | 4.2.3.5           |
| 23766              | Sandor von Kontz of Tenterfield                              | <b>Project Needs, Justification and Alternatives:</b> The assumption of the enormous growth of electricity consumption is based on questionable figures and the belief that the federal and state government efforts to reduce electricity use, efforts like your "Smart Grid Smart Cities Initiative" are completely useless | 4.2.3.5           |
| 23766 (attachment) | Sandor von Kontz of Tenterfield<br>Submission letter<br>EPBC | <b>Biodiversity:</b> Concerns for the Grey Headed Flying Fox <i>Pteropus Poliocephalus</i> , in relation to potential impacts from HV power lines – risk of flying into them and disturbance to orientation from radiation which may impact negatively on their breeding.   | 4.6.3.11          |

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| Public Submissions |                                 |  |                      |
|--------------------|---------------------------------|--|----------------------|
| Submission Number  | Author                          | Comment  | Section Addressed    |
| 23766 (attachment) | Sandor von Kontz of Tenterfield | <b>Biodiversity:</b> Birds are particularly vulnerable to HV power lines not only because they tend to fly into them, but the radiation disturbs their orientation and tends to impact negatively on their breeding.   | 4.6.3.11             |
| 23766 (attachment) | Envirolink                      | <b>Biodiversity:</b> The Survey methodology employed within the study falls short of the requirements of the DEC 2004 survey guidelines and may go part way to explaining the very low number of flora species identified. Additionally, it is not consistent with DEH 2006 (now SEWPaC) guideline for the identification of the Critically Endangered Ecological Community (CEEC) - <i>White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grasslands</i> . | 4.6.3.16             |
| 23766 (attachment) | EnviroFactor                    | <b>Biodiversity:</b> The amount of time spent on the vegetation community mapping ie 5 hours aerial photograph interpretation (API) seems minimal given the length of the Project area, and significant variation in terrain elements, elevation, geology and climate.   | 4.6.3.17             |
| TG 1               | Charmaine Harrison              | <b>Project Needs, Justification and Alternatives:</b> Alternatives were not fully discussed  | 4.2.3.4              |
| TG 1               | Charmaine Harrison              | <b>Project Needs, Justification and Alternatives:</b> Using TransGrid's own forecasts the line is not needed   | 4.2.3.5              |
| TG 1               | Charmaine Harrison              | <b>Socioeconomics:</b> property value will fall  | 4.14.3.1             |
| TG 1               | Charmaine Harrison              | <b>Visual Assessment:</b> Seeing the line every day is very distressing  | 4.8.3.1              |
| TG 1               | Charmaine Harrison              | <b>Biodiversity:</b> The impacts of the Project will be devastating.   | 4.6.3.1              |
| TG 2               | Christopher Harpham             | <b>Project Needs, Justification and Alternatives:</b> The proposal is inadequate in that it does not comply with AER   | 4.2.3.3              |
| TG 2               | Christopher Harpham             | <b>Traffic and Transportation:</b> Access tracks will be an ongoing burden   | 4.15.3.5             |
| TG 3               | AL and VA Schroder              | <b>Hazard risk and Bushfire:</b> there is an increased risk of Bushfire due to the frequency of electrical storms  | 4.12.3.1             |
| TG 3               | AL and VA Schroder              | <b>Project Needs, Justification and Alternatives:</b> There are fundamental questions about the justification of the Project   | 4.2.3.1              |
| TG 3               | AL and VA Schroder              | <b>Socioeconomics:</b> falling land values will affect superannuation  | 4.14.3.5             |
| TG 3               | AL and VA Schroder              | <b>Traffic and Transportation:</b> impacts on Sunnyside air strip.   | 4.12.3.3             |
| TG 4               | James & Philippa Lilyman        | <b>Visual Assessment:</b> General objection to visual amenity impacts  | 4.8.3.1              |
| TG 4               | James & Philippa Lilyman        | <b>EMF:</b> The transmission lines will adversely affect the health of farmers who will have to work close to the line and the long term effects of EMF's on cattle, sheep & crops' fertility are of great concern   | 4.13.3.1<br>4.13.3.2 |

## Appendix A - Summary of Submissions

| Public Submissions |                          |   |                      |
|--------------------|--------------------------|---|----------------------|
| Submission Number  | Author                   | Comment   | Section Addressed    |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> despite carrying out analysis of network and non-network options, only subsequent to TransGrid Action Group Inc. (TAG) and Upper Dumaresq Action Group (UDAG) making Federal Minister Mr Tony Windsor aware of the breach in 2010, TransGrid must be held accountable for the fact that it breached the Act | 4.2.3.3              |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> Nowhere in TransGrid 's Project does it take into account the North Coast community's uptake of energy saving systems ie: light bulbs, insulation, heat pumps, solar water heating plus solar and wind electricity generation   | 4.2.3.4              |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> TransGrid has failed at every stage to adhere to the recommendations and findings of the Eastlink Enquiry.  | 4.2.3.2              |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> TransGrid has not fulfilled the following mandatory requirements:- TransGrid did not take any account of the impact of non-network options prior to its initial proposal as mandated by section 5.6.6 in the National Electricity Rules   | 4.2.3.3<br>4.2.3.4   |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's basis for Project justification is based on faulty data.   | 4.2.3.1<br>4.2.3.5   |
| TG 4               | James & Philippa Lilyman | <b>Project Needs, Justification and Alternatives:</b> TransGrid 's failure to take into account alternate energy sources is a direct breach of the National Electricity Rules.  | 4.2.3.3              |
| TG 4               | James & Philippa Lilyman | <b>Socioeconomics:</b> impacts on the tourism industry which depends for its very livelihood on the pristine, unspoilt and natural landscape in this region.  | 4.14.3.2             |
| TG 4               | James & Philippa Lilyman | <b>Socioeconomics:</b> The proposed Project will not only greatly devalue the acreage of current landholders, it will certainly deter new purchasers from coming to this naturally beautiful area   | 4.14.3.1<br>4.14.3.3 |
| TG 5               | Janelle Nairn-Ambrose    | <b>Project Needs, Justification and Alternatives:</b> Alternatives would be preferred   | 4.2.3.4              |
| TG 5               | Janelle Nairn-Ambrose    | <b>Biodiversity:</b> There are likely to be impacts.  | 4.6.3.1              |