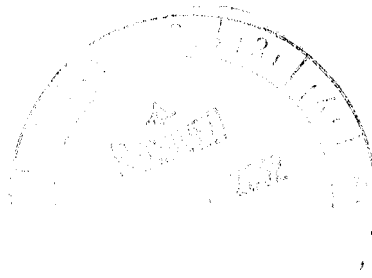


13<sup>th</sup> May 2002

Dr Tom Parry  
Chairman  
Independent Pricing and Regulatory Authority Tribunal of NSW  
PO Box Q290  
QVB Post Office  
Sydney NSW 1230



Dear Sir,

**Electrical Undergrounding in New South Wales - An Interim Report to the Minister for Energy (Independent Pricing and Regulatory Tribunal, April 2002)**

My submission highlights a range of environmental considerations and the bearing they would have on the cost and time components of an undergrounding program. I recognise that the closing date for the receipt of submissions has passed and I apologise for the delay in my submission. However, as a member of the community with a considerable and ongoing interest in the energy distribution industry, I request that my submission be considered.

IPART acknowledge that the costing estimates provided are indicative only and that an engineering assessment of the factors that would affect the cost of undergrounding is necessary. In addition, further consideration of the environmental costs both quantifiable and non-quantifiable should also be undertaken before conclusions are drawn regarding the justification of this proposal.

Without assigning a monetary value to the benefits of visual improvements, the cost benefit analysis results for undergrounding indicate that costs significantly outweigh benefits. The cost benefit ratio is further skewed with the addition of costs associated with environmental processes associated with the planning, establishment, operation and maintenance of an underground network.

- Major environmental planning and community consultation campaigns would be required throughout the strategic planning, environmental impact assessment, and construction phases. The resources necessary to complete these tasks would be increased under an optimally planned underground network that entailed incursions into areas beyond the existing overhead network and required the establishment of new easements. The complexity of the consultation campaign would depend on the preferred funding arrangements. The greater the contribution of the landholder, the stronger their entitlement to involvement in the planning process. As is commonly the case, the duration of the consultation process could potentially be extended in meeting the challenge of reaching planning consensus within individual communities.
- The implementation of an underground network would have direct and ongoing ecological impacts through clearing for initial trenching and subsequent repairs and replacement works. Trenching or boring activities would have adverse effects on the root networks of existing trees and vegetation. Unless all land above underground cables was kept free of vegetation, there would be a need to disturb established ground covers, shrubs or trees to gain access to undertake the repair of underground cables. The savings realised through the reduction in trimming costs by undergrounding may be eroded by the need to remove vegetation above underground cables whether it be done on a deliberate regular basis or only as required for maintenance or repair work. The aesthetic benefits associated with undergrounding and the cessation of tree trimming may be reduced by the need to remove trees entirely to construct the underground network.
- The generation of waste through the decommissioning and demolition of the existing overhead network would be contrary to the objectives of NSW waste/resource legislation. The considerable