

REVISED SUBMISSION BY POWERCO LIMITED ON MATAMATA PIAKO DISTRICT COUNCIL PLAN CHANGE 51

To: Matamata Piako District Council

PO Box 266

Te Aroha 3342

Attn: Mark Hamilton

submissions@mpdc.govt.nz

From: Powerco Limited ("Powerco")

Private Bag 2061 New Plymouth

(Note that this is not the address for service.)

Feedback closes Thursday 26th October 2017.

- 1. This is a submission by Powerco Limited on Matamata Piako Plan Change 51, which is a development concept plan for a milk processing site at the Open Country Dairy Factory at 60 New St, Waharoa 3401.
- 2. The reasons for Powerco's submission are set out in the attached schedule (Schedule 1). In summary, this submission seeks to ensure that our electricity assets are not adversely affected by the proposal and security of electricity to the site is maintained.
- 3. Powerco does not wish to be heard in support of this submission.
- 4. If others make a similar submission, Powerco would consider presenting a joint case at any hearing.

REVISED VERSION Dated at New Plymouth this 24th day of November 2017

Signature of person authorised to sign on behalf of Powerco Limited:

Simon Roche

ADDRESS FOR SERVICE: Powerco: Private Bag 2065

New Plymouth 4342

Attention: Simon Roche

Phone: 64 06 9681779

Email: simon.roche@powerco.co.nz

Ref: SUB/2017/34

Schedule 1 – Submission by Powerco

SCHEDULE 1 REASON FOR POWERCO'S SUBMISSION

1. INTRODUCTION

- 1.1. This submission has been prepared on behalf of Powerco Limited (Powerco). Powerco is New Zealand's largest electricity and second largest gas distributor in terms of network length, and has been involved in energy distribution in New Zealand for more than a century. The Powerco network spreads across the upper and lower central North Island servicing over 400,000 consumers. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand.
- 1.2. Powerco's electricity networks are located in five regions Taranaki, Manawatu-Whanganui, and Greater Wellington (Wairarapa only), as well as parts of the Bay of Plenty and Waikato. Powerco distributes electricity to residential and commercial customers throughout parts of the Waikato Region.
- 1.3. Powerco has electricity assets within the site included in Proposed Plan Change 51 (PPC 51) including underground cables, distribution transformers and high voltage switch boxes. The locations of these assets are illustrated on the maps provided in Appendix A. The underground cable in the north of the site is protected by an easement on the Deposited Plan. Powerco seeks to ensure its electricity assets are appropriately protected and provisions are included to enable the ongoing development, operation, maintenance and upgrading of its electricity distribution network.

2. POWERCO'S SUBMISSION

2.1. The applicant, Open Country Dairy Limited (OCD) is seeking a plan change to the Matamata Piako District Council District Plan (District Plan) to establish a Development Concept Plan (DCP) for their site at Factory Road, Waharoa. The proposal allows for future development of the site including new buildings.

- 2.2. Powerco acknowledges previous correspondence with the applicant in regards to existing capacity on the site. Powerco staff provided advice that there is sufficient existing electricity network capacity to provide for the upgrades proposed to the OCD site. There may not be sufficient capacity should the upgrade plans change significantly from those discussed. Any further enquiries regarding network capacity should be sent to Powerco's Key Customer Manager Paul Mitchell (email: Paul.Mitchell@powerco.co.nz).
- 2.3. Powerco is neutral to the proposed plan change but seeks to ensure that it does not result in unreasonable constraints being placed on its established electricity assets, including its below ground distribution networks. It is important that any new buildings, ground cover or excavations recognise the presence of existing Powerco assets and provides for the development, operation, maintenance and upgrading of such assets. As such, Powerco seeks to ensure that the Council takes the following matters into account when considering this private plan change:
 - Major changes to ground level: Significant reductions or alterations in ground level can result in underground utilities being exposed and the need for remedial work, whereas significant increases in ground level can hinder access for maintenance purposes. Powerco has experienced situations in other jurisdictions where underground cables have been buried to depths of up to five metres as a result of works to raise ground levels, which makes access a significant impediment. In addition, too little cover can be problematic and result in significant restrictions on cable routes. Changes to ground level in the vicinity of underground utilities should be minimised and/or there should be discussions with the relevant utility provider, which may identify opportunities to readjust depth of the utility. Similar concerns arise for above ground infrastructure.
 - Locating new buildings over our underground cables or too close to transformers: Inappropriate development in close proximity to underground electrical cables can result in damage to assets (e.g. earthworks can result in damage through direct contact, compaction or undermining of assets) or may restrict Powerco's ability to access assets for maintenance and upgrade purposes (e.g. by building over underground assets). This could, in turn, result in the loss or disruption of supply to the site. Powerco requests that prior to work being undertaken in close proximity to existing underground assets that the 'Dial Before You Dig' service is used. This can be found online at www.beforeudig.co.nz and provides information on the location of

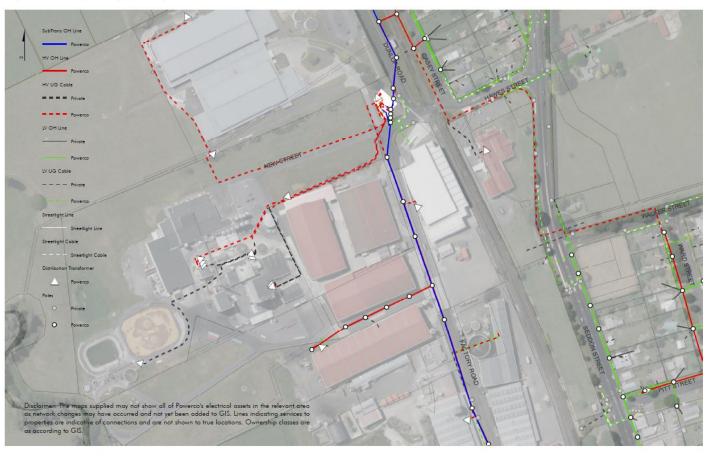
underground services, so that such services can be identified before works commence. This avoids risk of injury or service disruption if lines are accidently dug into, the location of underground infrastructure should be identified prior to works.

3. CONCLUDING COMMENT

- 3.1. In conclusion, Powerco is neutral to this private plan change However, should the plan change become operative, Powerco seeks to ensure that it does not result in unreasonable constraints being placed on its established below and above ground electricity assets (shown in Appendix A). It is important that any alterations to the site recognises the presence of existing Powerco utilities and provides for the continued development, operation, maintenance and upgrading of such assets.
 - 3.2. Powerco would be pleased to discuss any of the matters raised above, and comment on any documents produced as a result of this consultation. If you have any queries or require additional information please do not hesitate to contact Simon Roche (06) 9681779.

Appendix A: Powerco assets at the Open Country Dairy Factory

Open Country Dairy Factory







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- 1. This is a submission by Powerco Limited on Matamata Piako Plan Change 51, which is a development concept plan for a milk processing site at the Open Country Dairy Factory at 60 New St, Waharoa 3401.
- The reasons for Powerco's submission are set out in the attached schedule (Schedule 1).
 In summary, this submission seeks to ensure that our electricity assets are not adversely affected by the proposal and security of electricity to the site is maintained.
- 3. Powerco does not wish to be heard in support of this submission.
- 4. If others make a similar submission, Powerco would consider presenting a joint case at any hearing.

Dated at New Plymouth this 25th day of October 2017

Signature of person authorised to sign on behalf of Powerco Limited:

Server Roche

Simon Roche

ADDRESS FOR SERVICE:

Powerco: Private Bag 2065

New Plymouth 4342

Attention: Simon Roche

Phone: 64 06 9681779

Email: simon.roche@powerco.co.nz

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Schedule 1 – Submission by Powerco

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1. INTRODUCTION

- 1.1. This submission has been prepared on behalf of Powerco Limited (Powerco). Powerco is New Zealand's largest electricity and second largest gas distributor in terms of network length, and has been involved in energy distribution in New Zealand for more than a century. The Powerco network spreads across the upper and lower central North Island servicing over 400,000 consumers. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand.
- 1.2. Powerco's electricity networks are located in five regions Taranaki, Manawatu-Whanganui, and Greater Wellington (Wairarapa only), as well as parts of the Bay of Plenty and Waikato. Powerco distributes electricity to residential and commercial customers throughout parts of the Waikato Region.
- 1.3. Powerco has electricity assets within the site included in Proposed Plan Change 51 (PPC 51) including underground cables, distribution transformers and high voltage switch boxes. The locations of these assets are illustrated on the maps provided in Appendix A. The underground cable in the north of the site is protected by an easement on the Deposited Plan. However, another cable in the centre of the site does not currently have an easement. Powerco seeks to ensure its electricity assets are appropriately protected and provisions are included to enable the ongoing development, operation, maintenance and upgrading of its electricity distribution network.

2. POWERCO'S SUBMISSION

2.1. The applicant, Open Country Dairy Limited (OCD) is seeking a plan change to the Matamata Piako District Council District Plan (District Plan) to establish a Development Concept Plan (DCP) for their site at Factory Road, Waharoa. The proposal allows for future development of the site including new buildings.

- 2.2. Powerco acknowledges previous correspondence with the applicant in regards to existing capacity on the site. Powerco staff provided advice that there is sufficient existing electricity network capacity to provide for the upgrades proposed to the OCD site. There may not be sufficient capacity should the upgrade plans change significantly from those discussed. Any further enquiries regarding network capacity should be sent to Powerco's Key Customer Manager Paul Mitchell (email: Paul.Mitchell@powerco.co.nz).
- 2.3. Powerco is neutral to the proposed plan change but seeks to ensure that it does not result in unreasonable constraints being placed on its established electricity assets, including its below ground distribution networks. It is important that any new buildings, ground cover or excavations recognise the presence of existing Powerco assets and provides for the development, operation, maintenance and upgrading of such assets. As such, Powerco seeks to ensure that the Council takes the following matters into account when considering this private plan change:
 - Major changes to ground level: Significant reductions or alterations in ground level can result in underground utilities being exposed and the need for remedial work, whereas significant increases in ground level can hinder access for maintenance purposes. Powerco has experienced situations in other jurisdictions where underground cables have been buried to depths of up to five metres as a result of works to raise ground levels, which makes access a significant impediment. In addition, too little cover can be problematic and result in significant restrictions on cable routes. Changes to ground level in the vicinity of underground utilities should be minimised and/or there should be discussions with the relevant utility provider, which may identify opportunities to readjust depth of the utility. Similar concerns arise for above ground infrastructure.
 - Locating new buildings over our underground cables or too close to transformers: Inappropriate development in close proximity to underground electrical cables can result in damage to assets (e.g. earthworks can result in damage through direct contact, compaction or undermining of assets) or may restrict Powerco's ability to access assets for maintenance and upgrade purposes (e.g. by building over underground assets). This could, in turn, result in the loss or disruption of supply to the site. Powerco requests that prior to work being undertaken in close proximity to existing underground assets that the 'Dial Before You Dig' service is used. This can be found online at www.beforeudig.co.nz and provides information on the location of

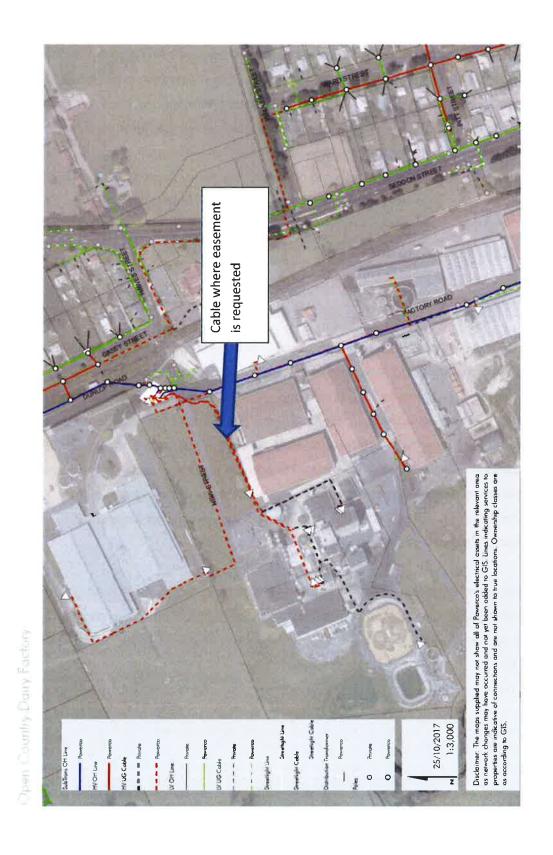
underground services, so that such services can be identified before works commence. This avoids risk of injury or service disruption if lines are accidently dug into, the location of underground infrastructure should be identified prior to works.

Easements: As outlined above, Powerco has an existing cable located within the site protected by a registered easement. This is shown as area "D" on Lot 1 DP 333824, which sets out terms and conditions around Powerco's ability to access its cable for maintenance and upgrade purposes. (Included as Appendix B) The existing electrical cable through the centre of the site (shown in Appendix A) was installed in 2004 without obtaining easements. Therefore, Powerco requests an easement in gross is created to adequately protect the cable from potential development and ensure appropriate consultation is undertaken with Powerco if, in future, there is a need to relocate or protect the cable. Should this be acceptable to the applicants, please contact Powerco's Network Property Administrator Kenn Calvert to discuss this matter further, on 07 928 6008 or kenn.calvert@powerco.co.nz.

3. CONCLUDING COMMENT

- 3.1. In conclusion, Powerco is neutral to this private plan change. However, should the plan change become operative, Powerco seeks to ensure that it does not result in unreasonable constraints being placed on its established below and above ground electricity assets (shown in Appendix A). It is important that any alterations to the site recognises the presence of existing Powerco utilities and provides for the continued development, operation, maintenance and upgrading of such assets. Powerco also requests our existing easement is recognised in any redevelopment and a new easement in gross is created, in Powercos favour, for the existing underground electrical cable that was installed in the site in 2004.
- 3.2. Powerco would be pleased to discuss any of the matters raised above, and comment on any documents produced as a result of this consultation. If you have any queries or require additional information please do not hesitate to contact Simon Roche (06) 9681779.

Appendix A: Powerco assets at the Open Country Dairy Factory



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Appendix B: Powercos existing easement

