

30/01/2018

Director
Industry and Infrastructure Policy
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

Draft Large-Scale Solar Energy Guideline, For State Significant Development

Thank you for the opportunity to make a submission on the draft Large-Scale Solar Energy Guideline, For State Significant Development (November 2017).

Background and Context

TransGrid is the operator and manager of the NSW high voltage transmission network and is involved with connecting large-scale electricity generating projects to the network. Our objective is to promote and facilitate new developments with efficient and cost-effective connections.

TransGrid supports the development of the Guideline and the objectives to provide the community, applicants and industry with guidance on the assessment of large-scale solar energy State Significant Development (SSD). Page 10 of the draft Guideline 'Planning approval – Transmission lines' relates to connections from solar energy projects to the electricity grid - comments related to this section are provided below.

TransGrid's Current Advice to Proponents

TransGrid frequently works with proponents of large-scale solar energy generation developments to connect them to the electricity grid. The connection work typically requires the development of new or upgraded transmission line and substation infrastructure, vegetation clearing, land/easement acquisition, and access roads/tracks. These connection works are directly associated to the proposed generation project, and are funded by the proponent.

TransGrid's position is to advise proponents that the associated connection works are to be incorporated into the planning assessment and approval process undertaken for the generation project. TransGrid therefore encourages connection proponents to contact TransGrid early, prior to commencing any planning approval process. Early consultation assists to clarify the scope of connection work that the proponent needs to include in the planning assessment, identify the proponents responsibilities, and establish contractual arrangements.

We believe this has benefits to the proponent and community including:

- > better assessment and consideration of the cumulative environmental impacts;
- > reducing the number of environmental assessments and approvals required, thereby facilitating more efficient and cost-effective assessments and connections; and
- > better wholistic community consultation that covers all relevant aspects of the project.

Inconsistency Between Advice and Draft Guideline

The draft Guideline is not aligned with the advice TransGrid provides to proponents, and therefore has potential to cause confusion and delays for proponents.

The draft Guideline states:

The Infrastructure SEPP makes development for the purpose of an electricity transmission or distribution network permissible without consent when carried out by or on behalf of an

electricity supply authority or public authority. Such development may be assessed under Part 5 of the EP&A Act.

For the Part 5 pathway to be applicable, TransGrid would need to nominate itself as the proponent of the connection work activity. However, TransGrid reserves the right not to nominate itself as the proponent for connection activities, regardless of who will own or operate the connection infrastructure following development. As such, TransGrid does not offer Part 5 assessment and determination for the majority of connection works for large-scale solar energy proposals.

Recommendations

In the interests of wholistic planning assessment and community consultation for large-scale solar energy proposals, we suggest that the draft Guideline be amended to support the expectation that the EIS is to include a detailed assessment of all associated electrical connection infrastructure and impacts. We suggest that the Guideline emphasise the need for early consultation with the relevant transmission operator or distribution network service provider, to identify the full scope of connection works, and agree to the planning assessment pathways.

Accordingly, we suggest reducing the emphasis on any separate Part 5 approval for the connection within the Guideline. We recommend that the Guideline identify that a Part 5 pathway for any of the directly associated connection works would only be available in limited cases, and only in consultation and agreement with the Department and the relevant transmission / distribution operator.

TransGrid does agree that in the limited cases where a Part 5 pathway is proposed for some or all of the connection works, the EIS should provide sufficient transparency to stakeholders and the community. To reduce any duplication and provide this transparency, we suggest that the EIS only include a brief statement of the proposed scope, location and timing of any associated connection works and note that the impacts will be assessed in a separate assessment under Part 5 of the EP&A Act.

Please don't hesitate to contact me on 9284 3815 if you have any questions on this submission. TransGrid appreciates ongoing consultation in relation to issues affecting the transmission network.

Yours faithfully



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Network Planning and Operations