



Ku-ring-gai Bat Conservation Society Inc.

Post Office Box 607, Gordon NSW 2072 Australia

A.B.N. 64 313 947 030

Electricity Undergrounding in New South Wales
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office NSW 1230

26 April 2002

Submission on the Interim Report on Electricity Undergrounding in NSW and the IPART bearing on 19 April 2002.

Following our attendance at the hearing on 19/4/02 the Ku-ring-gai Bat Conservation Society (KBCS) presents this second submission to the IPART inquiry into the benefits, costs and funding of undergrounding electricity supply in urban areas.

In the Terms of Reference for the inquiry, point 5, refers to 'an appraisal of the overall public benefit to the wider community'. KBCS requests that the issues outlined below be given greater weight in the final report.

Ecosystem Services

The KBCS in its previous submission explained that the electrocution of flying-foxes on overhead powerlines contributed to the population decline of a threatened species, the grey-headed flying-fox *Pteropus poliocephalus*. The ecosystem services it performs are pollination of many eucalypt species and dispersal of a suite of rainforest seeds. It would be extremely expensive to carry out these processes artificially, yet at present, it is difficult to value such ecosystem services in dollar terms. This is why, the 'precautionary principle' has been included in the principles of Ecologically Sustainable Development.

Nevertheless, there is a benefit to the whole community in avoiding electrocutions of flying-foxes as a contribution to maintaining the ecosystem services they perform.

In Section 3.2.2, the electrocution of wildlife is only mentioned as a matter improved public and wildlife safety. Instead, 'ecosystem services' should be presented in the final report as a separate sub-section in addition to the point made in 3.2.2.

Ecological Value of Local Native Street Trees

Although Figure 3.1, includes 'ecological and biological diversity' under improved amenity, the benefits to the community of retaining and having the space to replant trees in streets to act as bio-linkages between natural areas is not mentioned.

Also, there is considerable community anger at the way in which trees of all kinds are being damaged, some terminally, by contractors pruning around powerlines and communications cables. Trees made unstable and unhealthy by severe pruning are more likely to break and fall in storms.

All communities will benefit from a comprehensive plan to underground electricity cables across entire urban areas because trees in streets provide a wide range of benefits including amelioration of local climate, supporting wildlife and improving visual amenity.

Replacing power poles

The cost to the environment of taking mature trees from forests for replacing power poles is an expense to the environment. Therefore, this is a cost which can be avoided with undergrounding power.

Funding

Table 4.1 is missing some ticks. Under the column, *Wider Community*, there should be a tick against, Reduce wildlife electrocutions because there is a benefit from the whole community in terms of maintaining ecosystem services by eliminating flying-fox electrocutions. The reduction in transmission losses is a community benefit in that any reduction in the production of greenhouse gasses benefits everyone on earth.

KBCS believes that the decision to underground electricity in urban areas cannot be made on cost alone. There are important community benefits which cannot be given dollar values, as clearly stated in the report.

These unquantifiable benefits cannot be measured by estimating consumer's willingness to pay for undergrounding (Box 3.1). For example, very few people would have enough knowledge of the environment to understand the benefits to the community as a whole from preventing the electrocution of flying-foxes and retaining mature native trees in urban streets.

We remind the Tribunal that the NSW Government and its various bodies have adopted the Principles of Ecologically Sustainable Development and the NSW Biodiversity Strategy. Therefore, even IPART, is obliged to consider the longer term impacts of its recommendations on the environment and therefore on future generations. We look forward to the final report.

KBCS agrees with Peter Downey from Sydney Cables Down Under - "What we need is a program that is affordable and gives everyone a reason to want to opt in. If there are areas opting out you destroy the economics of the project, remove the ability to redesign the network and gain maximum efficiencies that benefit everyone".

Yours sincerely,



Nancy Pallin (phone 02 9416 7334)
Chairperson