

4th February, 2002
Reference: JWH:FM S31/3
Enquiries: Mr. Jim Hunter

Independent Pricing and Regulatory
Tribunal of New South Wales
Level 2
44 Market Street
SYDNEY NSW 2000

**Attention: Mr. Michael Seery
Programme Manager Electricity**

BY FAX: 9290-2061

Dear Sir/Madam,

Re: Submission - Undergrounding Electricity Cables in New South Wales

Manly Council appreciates the opportunity to comment on the Terms of Reference of the Independent Pricing and Regulatory Tribunal (IPART) Review.

Manly Council is particularly interested in making a Submission in relation to Terms of Reference:-

4. *The types of costs which are avoided as a result of undergrounding.*
5. *The distribution and timing of benefits to those who benefit including an appraisal of the overall public benefit to the wider community.*
6. *Options for funding undergrounding projects having regard to:-*
 - *Improvement to the urban environment and public amenity.*
 - *Reliability of electricity supply.*

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I will now address each of the Terms of Reference referred to above:-

4. *The types of costs which are avoided as a result of undergrounding.*

- (a) Manly Council has had an ongoing difficulty in working with Energy Australia and its predecessors in relation to the issue of management of street trees. There has been ongoing debate and argument regarding whose responsibility the maintenance of street trees should be, and in particular, whether those trees which are causing problems are planted trees or naturally grown trees.

This has lead to the Energy Supply Authority taking unilateral and precipitative action to maintain clearances which they would argue were on the basis of safety and maintaining the integrity of the system.

Manly Council would argue that the manner of pruning of trees is little short of “butchering” the trees and in many examples the aesthetic quality of the trees has been destroyed forever and that the trees in turn become disfigured and discordant within the streetscapes which we aim to improve and/or preserve.

Council has in the past interceded in the pruning of trees on a more regular basis than it would otherwise do, in an attempt to have the Energy Authorities not wield their axe (or chainsaw) on the trees in such a devastating manner.

- (b) Another cost which is associated with an overhead power system is the need and cost associated with the poles themselves, which are often a hazard on many roadways throughout the Local Government area. In many situations it has been necessary to provide expensive barriers near the poles so as to avoid the particularly devastating impact which a pole can have on a car in a collision.

In a nearby area at the moment there is a power pole which is decked with many floral tributes in memory of a person prematurely killed in a collision with a power pole.

- (c) Another cost which could be avoided both in actual cost terms and environmental terms is the need to treat power poles (timber) with potent pesticides, so as to avoid insect attack. This is frequently done adjacent to kerbs which in turn carry water to our stormwater disposal system and is potentially harmful.

5. *The distribution and timing of benefits to those who benefit including an appraisal of the overall public benefit to the wider community.*

- (a) There are many parts of the Manly Local Government area which have had undergrounding completed for various reasons and there can be little doubt that in terms of safety, aesthetics and amenity, the benefit to the wider community is obvious. These areas allow proper streetscape planning with the incorporation of lighting at appropriate locations instead of within the rhythm of the electricity overhead network. It also allows the placement of trees to optimum effect and in many instances it greatly improves the outlook from private properties which adjoin roads or reserves where the electricity network is installed.
- (b) The issue of public benefit in terms of views is particularly relevant in an area such as Manly which has many harbour and ocean views. It is regrettable that the height of the electricity infrastructure network in many instances is roughly equivalent to the window heights and viewing areas of the adjoining properties.

6. *Options for funding undergrounding projects having regard to:-*

- ***Improvement to the urban environment and public amenity.***
- ***Reliability of electricity supply.***

Manly Council would argue that the reason that main road infrastructure, central business district and regional centre undergrounding and some residential subdivision undergrounding has taken place is that there has been a realisation over time that this overall adds up to “the right way of dealing with the electricity network infrastructure”. For example, the amount of money spent by the Electricity Authorities over the years in maintaining their network free of trees would be a very, very substantial amount and in addition to that, the Electricity Authority has been replacing power poles which have deteriorated over time, again at substantial cost on a regular basis. Not to mention the cost of replacement poles damaged in accidents or fires, etc.

These days, State and Local Government regulations require environmental impact statements in relation to significant developments and there can be little argument that the environmental impact of the overhead infrastructure is negative on a number of grounds - cost, aesthetics, avoided costs, i.e. damage through accidents (cars, collision and electrocution). There are negative aspects to the safety of the overhead system in relation to electromagnetic radiation, etc.

It is understood that undergrounding power lines can reduce the magnetic fields by using shielded materials, etc.

CONCLUSION

Manly Council would argue that there can be little doubt as to the desirability on a number of grounds for the undergrounding of the overhead electricity cable network, however, it would appear that the issue is one of cost and priorities.

Manly Council is of the view that Local Government should not be the revenue collector for other areas of Government and even the maintaining of the street lighting system through Local Government seems to be a relatively inefficient arrangement whereby individual householders are not sure whether to contact the Energy Supply Authority or to contact their Local Council in relation to street lights not working or their power supply being interrupted.

Similarly, the involvement of Council Engineering staff in inspecting and appraising issues of street lighting adequacy seems to be duplicating a service and is one further link in the chain of communication which seems unnecessary.

Council sees no reason why street lighting of an area should not be merely part of the charge which the Electricity Supply Authority levies on property owners adjacent, i.e. the street lighting provided is of direct benefit to those people who are the customers of the Electricity Authority and who are already being billed.

It would seem that a percentage of the bill could in fact be earmarked for a special fund to provide undergrounding of the network, and as an extension of that, the provision of street lighting on an ongoing basis, i.e. a direct user pays contribution.

Council appreciates the opportunity to make the Submission.

The views expressed are those which have been expressed in discussion and debate on this issue over a considerable period of time.

Due to the short notice regarding the Tribunal's deliberation and the fact that Council has been in recess over the January period, the formal endorsement of the Submission has not been possible.

Yours faithfully,

J. W. Hunter,
Director Service Planning and
Commissioning