

| Topic | Relevant ToR section | Summary of submission comments | PB response |
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| wording of ToR | All | The words 'should' and 'may' are used throughout the document which leads to ambiguity. Clear and concise wording such as 'will' and 'shall' are more acceptable. | The purpose of a ToR is to set a framework about how an EIS is to be prepared and the information which the EIS should include. It is important to have some level of flexibility in the ToR so that additional matters may be included for consideration in the EIS based on site specific studies. Conversely, some matters listed in the ToR may be determined to be of limited applicability given site specific studies. Section 4.21 of the ToR provides for a cross reference of the findings of the relevant sections of the EIS, where the potential impacts and mitigation measures associated with the project are described, with the corresponding sections of the TOR. Amendment of the ToR is not considered necessary. |
| wording of ToR | All | When citing references, guidelines etc, provide the page and section reference to enable the reader to easily find it | A reference list will be included in the EIS (as per Section 10 of the ToR). All references consulted in the EIS will be provided in the reference list in a recognised format. No amendment to the ToR is considered necessary. |
| project justification | S. 2 Project Need and Alternatives (sub-section 2.1 Project Justification) | The proposed Project is questionable against the Charter of social and fiscal responsibility of the Financial Administration and Audit Act 1977. ToR needs to address the issues raised under the FAA. | Thank you for your submission in relation to this matter. However, the issue is not considered to directly relate to the ToR or the environmental impact assessment process. Therefore, this issue has been forwarded to Powerlink for consideration and response in due course. |
| project justification | S. 2 Project Need and Alternatives (sub-section 2.1 Project Justification) | The proposed project does not achieve the Queensland Government priorities listed in the State Purchasing Policy. The ToR needs to address issues raised under the SPP. | Thank you for your submission in relation to this matter. However, the issue is not considered to directly relate to the ToR or the environmental impact assessment process. Therefore, this issue has been forwarded to Powerlink for consideration and response in due course. |
| global warming, greenhouse | | The project will facilitate increased usage of greenhouse gas intensive fuel sources for the supply of energy. Powerlink need to explain in detail how this project advances Government priorities set out in the Queensland Governments Climate Smart 2050 policy document | Submissions made in this regard are noted. To the extent that greenhouse and climate change policies impact on the Project need, this issue will be considered in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | S. 2 Project Need and Alternatives (sub-section 2.1 Project Justification) | The submitter requests that the ToR requires provision of the analysis that proves that the proposed 'solution' is the least cost option available. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | S. 2 Project Need and Alternatives (sub-section 2.1 Project Justification) | The estimated demand is not supported by the approved SEQ Regional Plan and requires significant detailed analysis to be provided to the community to accurately substantiate the demand forecasts noted by Powerlink. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |

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| project justification | S. 2 Project Need and Alternatives (sub-section 2.1 Project Justification) | The demand projections upon which the proposed project is based are flawed and need to be revisited and recalculated based upon the current and projected circumstances. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| wording of ToR | Cover Page | Clearly state the legislation that this EIS is being conducted under. | Section 7.3 of the ToR indicates that a Ministerial designation for Community Infrastructure under the <i>Integrated Planning Act 1997</i> is being sought. Further, as noted in the Preface of the ToR, upon finalisation of the EIS and Powerlink's approval of the Final Alignment and substation site, Powerlink will follow the Department of Local Government, Planning, Sport and Recreation "Guidelines about Environmental Assessment and Public Consultation Procedures for Designating Land for Community Infrastructure, Powerlink Manual". Amendment of the ToR is not considered necessary. |
| wording of ToR | Preface | Clarify and determine what the term 'regard' means in the Preface. | Submissions in relation to this matter are noted however, the term 'regard' takes the standard dictionary meaning and consequently, the context of the ToR is considered appropriate. Therefore, amendment to the ToR is not considered necessary. |
| project justification | Project Description | The submitter requests clarification of the area defined as the northern Sunshine Coast & Gympie, inclusion of a map, current and forecast electricity consumption for the area, and capacity provided by the proposed project, and current population and population projections. | The proposed powerline and substation are required to meet the long-term cumulative future electricity needs of the large area comprising the northern Sunshine Coast and Gympie and surrounds – and ensure a secure and reliable supply of high voltage electricity is maintained to more than 160,000 people (and growing) in communities in the northern Sunshine Coast, Gympie and surrounds (i.e. from the Maroochy River north to Noosa, west as far as Amamoor, Imbil and Kenilworth, and to the towns of Gympie, Rainbow Beach and Tin Can Bay). Section 2.1 of ToR includes scope for: 'A detailed assessment of the need for the proposed development(which) should outline the deficiencies of the existing transmission network system; make particular reference to the power demand in the affected areas, in accordance with the <i>Electricity Act 1994</i> , and the predicted future needs. No amendment to the ToR is considered necessary. |
| project justification | Project Location | Specify all of the planned connections from either the existing substation at Cooroy or the proposed new substation at Cooroy South that will be enabled by the Project | Distribution connections are not included as part of the project and Energex may be contacted for further information relating to distribution network development. Therefore, no amendment of the ToR is considered necessary. |

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| project justification | Project Need, Scope & Objectives | The scope of the project should include all of the foreseeable power supply lines and infrastructure from the substation that will be provided by Energex | Distribution connections are not included as part of the project and Energex may be contacted for further information relating to distribution network development. Therefore, no amendment of the ToR is considered necessary. |
| project justification | Project Need, Scope & Objectives | Include copies of the joint planning studies (undertaken by Powerlink & Energex) including the details of implicit and explicit assumptions made in calculating the forecasts of energy demand. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | Project Need, Scope & Objectives | Include details of 'the solution' and any alternative solutions that were considered, the criteria by which they were assessed and the measurement against those criteria. | Submissions made in this regard have been noted. A report, which addresses route and substation site selection, will be included as part of the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | Project Need, Scope & Objectives | Explain why the substation point must be as close as possible to the south of the Emerge Cooroy Switchyard and what alternatives have been considered. | A description of the project and alternatives will be provided in the EIS as per Section 2 of the ToR. No amendment to the ToR is considered necessary. |
| project justification | Project Need, Scope & Objectives | "Initially the 275 kV transmission line will be configured as a single circuit line with it converting to double circuit configuration by 2022 or 2023 based on predicted load growth". Explain in plain English what this means. What is the nature of the additional infrastructure/works proposed in 2022/23? Clarify if 'predicted load growth...' has been forecast to 2022/23 or beyond to justify this project. | This detailed information will be provided in the EIS as per Section 2 of the ToR. No amendment to the ToR is considered necessary. |
| route selection | Project Need, Scope & Objectives | A study alignment will be determined and will be the focus of the environmental impact assessment'. Explain what this means - clarify if this is restricting the scope of the EIS to the study corridor for the acquisition of new easements? | The focus of the EIS is the study alignment and substation site, however, for some aspects broader consideration is required. The study alignment is not restricted to that area over which new easements may be required, it includes the entire alignment from the sub-station at Woolooga to the proposed sub-station at Cooroy South. Amendment to the ToR is not considered necessary. |

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| project justification | Project Need, Scope & Objectives | Powerlink Queensland will submit the project to the 'Regulatory Test'. Please explain in detail what this process entails, the limitations and the successful application of the Regulatory Test in delivering solutions alternative to Powerlink's proposal in previous instances. | Submissions in this regard have been noted. With regard to this project ToR and EIS, the Regulatory Test is the cost-benefit analysis that Powerlink carries out at the time that the transmission network investment decision is made. This ensures the recommended solution is the most economic option to meet mandated reliability standards as the demand for electricity grows. Amendment to the ToR is not considered necessary. |
| social & economic | Purpose of the EIS | With regard to Page 9 para (c) of the ToR: Explain what the 'community acceptance' criteria are, who determines them, have they been established and who agrees to them. The community must determine what is acceptable. Describe the process by which this will be done and any avenues for the community to challenge the Powerlink process. | The 'criteria' being referred to is 'community acceptance'/non-acceptance'. This will be gauged through the consultation process e.g. submissions, meetings, feedback as outlined in Section 4.19 and will be assessed by community consultation consultants with appropriate qualifications and expertise and experience in this field. Amendment to the ToR is not considered necessary. |
| route selection | Purpose of the EIS | Against which criteria will Powerlink judge the 'feasible alternative ways to carry out the development'? In the alternative way to carry out the development, consideration should be given to alternative study corridors, alternative routes and configurations. | This submission is noted however, is not directly related to the ToR and therefore has been forwarded to Powerlink for appropriate response in due course. Amendment to the ToR is not considered necessary. |
| wording of ToR | Purpose of the EIS | Please list all of the relevant legislation with associated web addresses and references to relevant sections and pages for reference purposes. | A reference list will be included in the EIS (as per Section 10 of the ToR). All references consulted in the EIS will be provided in the reference list in a recognised format. No amendment to the ToR is considered necessary. |
| wording of ToR | Glossary of Terms | The glossary must include details for all legislation, plans, guidelines or other documentation referred to within the ToR/EIS including web addresses where the information can be reviewed and downloaded | A glossary is a list of basic, technical and difficult words in a subject or field with definitions and will be provided as part of the EIS. A reference list will also be provided and information sources cited in the text of the EIS will be included in the reference list using a standard and consistent method of referencing. No amendment to the ToR is considered necessary. |

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| wording of ToR | S. 1.1.2 Objectives of the EIS | The submitter suggests addition of the following objective dot point: 'to identify all potential social and community impacts (across short, medium and long term) of the proposed transmission line, easements, substation and associated works'. | As described in the 'Preface', the term 'environment' encompasses people and communities as well as social, economic, aesthetic and cultural conditions. Amendment to the ToR is not considered necessary. |
| project justification | S. 1.1.3 EIS Key Issues | Any and all known variables or assumptions made in the assessment must be clearly stated and discussed.' This is to include (but not be limited to) demand management forecasts and targets, impact of full lifecycle of greenhouse gas emissions in electricity delivered and consumed, the impact of the future price of carbon, the Mandatory Renewable Energy Targets and emissions reduction targets on energy infrastructure requirements over their projected life. | Submissions made in this regard have been noted. Feasibility studies have already been conducted and the need for the project established before the ToR is drafted. To the extent that Greenhouse and climate change policies impact upon the project need, this issue will be considered in the EIS. Amendment to the ToR is not considered necessary. |
| wording of ToR | S. 1.1.3 EIS Key Issues | The EIS is the principle means of ensuring that ecologically sustainable principles are applied in the decision making process...'. Outline in the ToR what ecologically sustainable principles Powerlink adheres to, and the sources of these principles. | The ToR requires provision of a comparative analysis in the EIS of how the Project conforms to the objectives for "ecological sustainable development" utilising the National Strategy for Ecologically Sustainable Development (1992) as a reference document. Amendment to the ToR is not considered necessary. |
| wording of ToR | S. 1.1.3 EIS Key Issues | ToR text: "If there is a necessity to make use of material that is considered to be of a confidential nature, the Consultant may request that such information remain confidential and not be included in any publicly available document". With regard to this statement in the ToR, the submitter requests inclusion of an explanation of the definition of 'confidential nature', who determines this and what avenues of appeal are available for the public. | This submission issue has been noted. The parties who provide the information determine the level of confidentiality of any of that information. Furthermore, there are legislative requirements dealing with privacy and confidentiality that must be complied with. No amendment to the ToR is considered necessary. |

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| consultation | S. 1.1.5 Public Consultation Process | PAGE believes that the consultation process is flawed. It does not address the two way flow of information required for an open and transparent consultation with the community. To facilitate an efficient exchange of information, it is recommended that service levels are set in response to information requests from the community (i.e. respond to requests within 5 business days). | Submissions made in this regard have been noted. As part of the consultation report within the Draft EIS, a review and summary of community issues raised will be included. The consultation process, which has been and will continue to be conducted, is that which is required for the EIS process prescribed by the Department of Local Government and Planning Guidelines for Environmental Assessment and Public Consultation Procedures for Designating Land for Community Infrastructure Schedule 5 – Powerlink Manual. Therefore, amendment of the ToR is not considered necessary. |
| consultation | S. 1.1.5 Public Consultation Process | Add 'any Sunshine Coast resident that expresses a concern about the project' to the list of groups to be consulted (page 16, para 1). | Section 1.1.5 page 16 paragraph 1 will be amended to include 'other interested individuals'. |
| consultation | S. 1.1.5 Public Consultation Process | Add the relevant Mayors of Noosa and Maroochy Shires and the relevant councillors from the Council Divisions that are affected. | The list of stakeholders in Section 1.1.5 of the ToR are those which have been nominated by the respective Councils as a result of consultation with the Councils. Amendment to the ToR is not considered necessary to address this issue. |
| consultation | S. 1.1.5 Public Consultation Process | Add 'residents' to the list of affected parties. | An amendment to Section 1.1.5 of the ToR has been made to include 'residents'. |
| consultation | S. 1.1.5 Public Consultation Process | Add 'PAGE' to the list of affected parties. | The list of stakeholders in Section 1.1.5 of the ToR has been amended to include P.A.G.E. |
| consultation | S. 1.1.5 Public Consultation Process | Add the 'Rural Fire Service' to the list of affected parties. | The Rural Fire Service Queensland is part of the Department of Emergency Services, which has been identified in Section 1.1.5 of the ToR to be consulted. It is assumed that the Department will disseminate the EIS information internally as considered appropriate. No amendment to the ToR is considered necessary. |
| town planning, legislation | S. 1.2 Controlled Actions | The submitter requests a statement regarding whether this project has been deemed to be a Controlled Action, whether the EIS has been accredited by the Federal Government and what Matters of National Environmental Significance are to be investigated. | As outlined under Section 7 of the ToR, matters of national environmental significance will be investigated and a decision will be made as to whether or not the Project will be referred based on the findings of this assessment. No amendment to the ToR is considered necessary. |

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| global warming, greenhouse | S. 1.2 Controlled Actions | Indirect impacts' needs to include the indirect production of greenhouse gases associated with the project but also the greenhouse gases associated with the generation of the power to be consumed by end users through the transmission lines proposed. | Submissions made in this regard have been noted. To the extent that greenhouse and climate change policies impact upon the project need, this issue will be considered in the EIS. Amendment to the ToR is not considered necessary. |
| project justification | S. 2.1 Project Justification | This discussion and analysis must include the recent and forecast changes in Federal Government Policy relating to climate change and water and the initiatives to reduce carbon emissions. | Submissions made in this regard are noted. To the extent that greenhouse and climate change policies impact on the Project need, this issue will be considered in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | S. 2.1 Project Justification | The project justification must also consider the economic and social costs of the proposed project. | Sections 3.7 and 4.19 of the ToR addresses project justification matters. Therefore, amendment to the ToR is not considered necessary to address this issue. |
| project justification | S. 2.1 Project Justification | To ensure social equity within the community and across the generations, the true cost of electricity supply must be spread evenly across the community without one section of the community subsidising another section (indirectly affected landholders). | Submissions in this regard have been noted. The ToR for this Project already includes provision for investigation and reporting in the EIS of the potential social and economic impacts of the Project such as potential impacts to affected property owners, communities, cultural values and community cohesion and potential impacts of construction activities and the construction workforce on local communities and landowners. Further, the TOR requires that the Draft EIS contain an analysis of the economic impacts of the Project on regional and local economies and business activity, particularly tourism, recreation and agricultural activities will be provided. Therefore, amendment of the ToR is not considered necessary. |
| route selection | S. 2.1 Project Justification | With regard to the ToR statement 'a detailed assessment of the need for the proposed development is required with regard to the suitability for the location proposed', the submitter advises that this statement appears to limit the scope of analysis. This section must include an analysis of the alternative study corridors as well as the selected corridor as this would provide a clear and transparent reasoning on the selection/rejection of the corridors. | Alternatives to the proposed Project which has been considered will be discussed in accordance with Section 2.2. of the ToR. Further, Section A3 of the ToR specifies that a copy of the Route Identification and Substation Site Selection Report should be included in the EIS. Amendment to the ToR is not considered necessary. |

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| consultation | S. 2.1 Project Justification | This section must also include detailed information on what community consultation has occurred within the other corridors. | Section 1.1.1 of the ToR requires a description of the consultation process for the EIS. Additionally, Section A3 of the ToR states that a copy of the Route Identification and Substation Site Selection Report should be provided with the EIS. No amendment to the ToR is considered necessary. |
| global warming, greenhouse | S. 2.1 Project Justification | The environmental impact of the cumulative incremental emission of greenhouse gas throughout the electricity generation lifecycle needs to be taken into account | Submissions made in this regard are noted. To the extent that greenhouse and climate change policies impact on the Project need, this issue will be considered in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| project justification | S. 2.1 Project Justification | A full analysis needs to be conducted of the economic costs and impacts of the 'proposed solution' in delivering electricity to the end consumer over the entire life of the project. Detail the assumptions made in such an analysis. | Section 2.1 of the ToR requires that a discussion regarding project justification be included. Additionally, an environmental cost-benefit summary will be provided in accordance with Section 8 of the ToR. Therefore, amendment to the ToR is not considered necessary. |
| town planning, legislation | S. 2.1 Project Justification | With regard to 'suitability of location proposed' this must address the adverse impact on the local plans in place to conserve the scenic amenity and rural characteristics of the corridor for the proposed powerlines (Maroochy Plan, Noosa Plan, OUM's Implementation Guideline No. 8 'Identifying and protecting scenic amenity values') | Local government planning and land use requirements of the relevant Council areas including local ordinances and by-laws such as local vegetation laws will be considered and discussed as per Section 7.2 of the ToR. Additionally, an assessment of any potential conflict with relevant Planning Scheme measures including strategic plans, any development control plans and the intent of the zones through which the transmission corridor may pass will be included. OUM's guideline is associated with implementation of the South East Queensland Regional Plan and will be considered as per Section 5.4. Amendment of the ToR is not considered necessary. |
| hydrology | S. 2.1 Project Justification | With respect to development and location of the substation, what factors have Powerlink considered in selecting flood-prone land for an electrical substation? | Submissions in this regard are noted. Investigation of the frequency and extent of flooding is included in Section 4.11.1 of the ToR. Further, Section A3 of the ToR specifies that a copy of the Route Identification and Substation Site Selection Report should be included in the EIS. Therefore, amendment of the ToR is not considered necessary. |
| town planning, legislation | S. 2.2 Alternatives to the Project | (page 21, S. 2.2, para 1) Explain where in the Electricity Act 1994 power demands and predicted future needs are stated. | Legislation will be reviewed and discussed in detail as part of the EIS. In relation to project need, Powerlink's obligations under the Electricity Act will also be described. Amendment of the ToR is not considered necessary. |

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| alternative energy supply options | S. 2.2 Alternatives to the Project | This section must include a full cost economic assessment of the alternatives including the full cost of generation and delivery of power to end consumers from the alternatives compared to the selected method and in line with the Least Cost Planning methodology so as to arrive at the optimal mix of initiatives to achieve the desired community outcomes. | Discussion regarding alternatives to the Project including demand side management strategies, different transmission capacity, alternative technologies such as undergrounding and alternative construction methodologies is already included in the ToR and consequently, will be addressed in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| alternative construction methods | S. 2.2 Alternatives to the Project | Please state if this project has an undergrounding contingency associated with it. | Alternative technologies such as undergrounding and alternative construction methodologies will be considered in accordance with Section 2.2 of the ToR. No amendment to the ToR is considered necessary. |
| project justification | S. 2.2 Alternatives to the Project | Include details of the least cost planning that has been carried out by Powerlink and a discussion of the costs associated with the assertion that 'the solution' selected is the least cost option. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| property devaluation, compensation | | Compensation for the 'existing easement' is required. PAGE contend that this undermines the original submission made by Powerlink to the Australian Energy Regulators and as such, Powerlink need to resubmit this proposal to AER. | Thank you for your submission in relation to this matter. However, the issue is not considered to directly relate to the ToR or the environmental impact assessment process. Therefore, this issue has been forwarded to Powerlink for consideration and response in due course. |
| project justification | S. 2.2 Alternatives to the Project | The full adverse impact on land values within the vicinity of powerlines needs to be measured and assessed and included in the project cost. | Submissions made in this regard have been noted. Discussion regarding the Project need and justification is already included in the ToR and therefore, will be included in the EIS process and reported in the Draft EIS. Therefore, amendment of the ToR is not considered necessary. |
| health | S. 3.3 Physical details of structures | Provide details of the alignment of the transmission lines and the distances from the outside conductors to any built structures within 1km of the transmission lines. | EMF studies will be undertaken by specialist, qualified sub-consultants and will address Section 4.20 of the ToR. EMF studies will be conducted in accordance with best practice principles for the entire Study Alignment. Key locations relevant to the overall assessment will be chosen by the specialist sub-consultants. Amendment to the ToR is not considered necessary. |